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June 5, 2026

Members of the Tiverton Town Council  
Tiverton Town Hall  
343 Highland Road  
Tiverton, RI 02878

VIA EMAIL

Dear Town Councilors:

We write to the Town Council to reiterate the ACLU of Rhode Island's serious concerns regarding the expansion of Flock Safety automated license plate readers (ALPRs) in Tiverton via the inclusion of a \$23,000 line item to the Town's budget.<sup>1</sup> While we certainly understand the importance of public safety, the approach to safer communities cannot and should not include the continued usage of technologies – like these cameras – which raise significant privacy issues, are implemented with strikingly no statutory safeguards in place, and carry the clear potential for future expanded surveillance. We therefore again urge you to reject this request.

We previously shared a letter with the Town Council addressing our concerns in depth and have attached it here for the Council's reference. Since sending that initial letter in March 2026, and because Tiverton already has two Town-owned cameras, it is worth noting some recent and significant changes Flock Safety has made to their contracts that directly impact a municipality's control over their data.

Prior versions of Flock Safety's terms and conditions explicitly stated that "Flock does not own and shall not sell Customer Data," but that assurance has since been removed. Instead, the newest version now grants the company "the exclusive right to determine and control the method, timing, format, and medium" of access to the data that allegedly belongs to the customer. The new terms and conditions now also give the company a "perpetual" right to use the customer's data to "support and improve" its services, effectively meaning that the company can use and retain footage forever – even after the customer has ended their contract with Flock Safety, which is much longer than the 30-day retention period that is currently the standard in Rhode Island. The new contract terms also change the governing law for disputes from the state in which the customer is located to the State of Georgia, where Flock Safety is headquartered.

Additional troubling information regarding Flock Safety ALPRs nationwide has come to light that the Council must know before considering this budget request. Specifically, it was recently reported that the Federal Bureau of Information (FBI) issued a request for proposal seeking a vendor – like Flock Safety – that will allow the FBI access to ALPR data collected

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<sup>1</sup> This would pay for four additional cameras. This is in addition to the existing two Town-owned cameras, and the two Rhode Island State Police-owned cameras located in Tiverton, bringing the total to eight cameras in the town.

nationwide.<sup>2</sup> This is particularly concerning given that this permission will give the FBI the ability to tap into a vast surveillance network, and would include Tiverton’s proposed expanded reach.

As we have noted prior, ALPRs are virtually unregulated in Rhode Island. As a result, the privacy rights of the public remain at the complete discretion of the police department and a private company, which can change their policies at any time. No matter what assurances of privacy are given in policy – by either a police department or Flock Safety – there are no meaningful constraints on either of their ability to change the rules at any time.<sup>3</sup> Before the Council is a prime example of Flock changing their policy in real time. As Chief Costa noted in the May 11, 2026 budget discussion, the request to add more cameras to this community is based on changes made to Flock Safety’s policies, by limiting access to sharing and viewing benefits based on the number of cameras in communities.<sup>4</sup> We also wish to emphasize that Chief Costa stated that Flock Safety plans on charging communities more money for having fewer cameras, indicative that smaller communities are seemingly being penalized by purchasing fewer cameras.

Lastly, we wish to reiterate the numerous nationwide misuses fostered by Flock Safety’s signature sharing network. Our previous letter to the Council included reference to two well-known instances of system misuse in other states: police departments sharing information with Immigration and Customs Enforcement, and separately tracking a woman suspected of having an abortion. However, the misuses are not limited to those narrow areas. Notably, this system has been utilized by police in other states to monitor protests, and also has been used by individual police officers to track former romantic partners.<sup>5</sup> Recently, police officers used Flock Safety ALPRs to give a man a ticket for “holding a phone in his left hand,” despite the fact that these systems allegedly only capture license plate numbers.<sup>6</sup> Straying even further away from the criminal investigation purpose of these cameras, a report from the Electronic Frontier Foundation recently noted that ALPR data was being used by police departments to verify students lived in the school districts in which they attend school, as part of employment background checks, and to investigate noise complaints.<sup>7</sup>

The request before the Town Council is also being considered at a time when many municipalities across the country, including jurisdictions in nearby Massachusetts, are terminating their contracts with Flock Safety.<sup>8</sup> The Council can – and we believe should – follow the lead of those municipalities moving away from these technologies.

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<sup>2</sup> <https://www.newsweek.com/fbi-plan-license-plate-data-track-drivers-nationwide-11967352>

<sup>3</sup> Legislation intended to regulate the use and procurement of these systems has been introduced in the past legislative sessions and have been held for further study in committee after facing opposition from law enforcement agencies. This year’s legislation includes new, explicit data sharing protections. See 2026-H 8077: <https://webserver.rilegislature.gov/BillText/BillText26/HouseText26/H8077.pdf>.

<sup>4</sup> May 11, 2026 Tiverton Town Council meeting at approximately 1:19:09 <https://www.youtube.com/watch?v=B8JvEgVntxA&list=PLIxCnTj69y6U60gwYLOk6A6u3Zu0Jj0gs&index=9>

<sup>5</sup> See, e.g., <https://www.eff.org/deeplinks/2025/11/how-cops-are-using-flock-safetys-alpr-network-surveil-protesters-and-activists>; <https://wisconsinexaminer.com/2026/03/13/wisconsin-communities-grapple-with-police-misuse-of-flock-surveillance/>; <https://www.yahoo.com/news/kansas-police-chief-used-flock-093300946.html?guccounter=1>

<sup>6</sup> <https://www.404media.co/police-used-flock-to-give-a-man-a-traffic-ticket/>

<sup>7</sup> <https://www.eff.org/deeplinks/2026/05/more-license-plate-reader-mission-creep-school-residency-verification-background>

<sup>8</sup> See, <https://www.cambridgema.gov/news/2025/12/statementontheflocksafetyalprcontracttermination>.

While we understand the desire to keep people safe, public safety is the result of community-based tools and systems that directly and tangibly support residents — it is not, and has never been, a result of indiscriminate 24/7 surveillance. Thank you for your consideration of our views and we would be happy to answer any questions you may have.

Sincerely,



Steven Brown  
Executive Director



Madalyn McGunagle  
Policy Associate

cc: Col. James N. Costa, Chief of Police  
Patrick Jones, Town Administrator  
Joan Chabot, Town Clerk

Enclosure



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March 6, 2026

Members of the Tiverton Town Council  
Tiverton Town Hall  
343 Highland Road  
Tiverton, RI 02878

VIA EMAIL

Dear Town Councilors:

Scheduled for the Town Council meeting on March 9 is a request from the Rhode Island State Police (RISP) seeking approval to install Flock Safety automated license plate reader (ALPR) cameras in the Town of Tiverton. Tiverton already has two municipal-owned Flock Safety cameras that are operating without adequate privacy safeguards in place. We are writing to express the ACLU of Rhode Island's deep concerns regarding the proposed installation of additional Flock Safety ALPR systems in your town, and the lack of safeguards surrounding the use of the current systems.

Based on the RISP's testimony at the Bristol Town Council hearing on November 12, 2025, we understand that the RISP has asked 22 Rhode Island municipalities for permission to install 39 Flock ALPR cameras in their communities. While the ACLU of Rhode Island certainly understands the importance of public safety, the approach to safer communities cannot and should not include the continued usage of technologies – like these cameras – which raise serious privacy issues, carry the clear potential for future expanded surveillance, and are implemented with no statutory safeguards in place. We therefore urge you to reject the request of the RISP.

The request before the Town Council is being considered at a time when numerous jurisdictions across the country are terminating their contracts with Flock Safety. Recently, Cambridge, Massachusetts ended its contract with the company following what the City described as a "breach of trust," after Flock Safety installed two cameras without the City's knowledge, and despite the City's camera program being paused two months prior.<sup>1</sup> If the Council so chooses, Tiverton can also cancel its contract with Flock Safety.

Our organization has substantive concerns about the actual technology of these cameras, but we are just as worried by the possibility that these surveillance systems are being implemented without the concurrent introduction of statutory safeguards and limitations for their use. We wish to provide some context as to why the ACLU believes your municipality should reject the request

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<sup>1</sup> <https://www.boston.com/news/local-news/2025/12/11/cambridge-ends-contract-for-license-plate-cameras-after-breach-of-trust/>. Among the many other diverse municipalities across the country that have just in the past few months terminated or decided not to renew their contracts with Flock Safety due to privacy concerns are: Prosser, WA; Watertown, MA; Syracuse, NY; Greenfield, MA; Natick, MA; Santa Cruz, CA; and Bend, OR.

for installation of these cameras and create safeguards governing the use of these systems already in place.

Our concerns are as follows:

- **The cameras capture more information than just license plate numbers.** Rhode Island’s use of other ALPR systems – such as those utilized for tolling purposes or to monitor traffic patterns – have generally been contained to capturing only the license plate on a vehicle, and only for a specific, narrow purpose. When the implementation of Flock Safety cameras in other municipalities began to occur, police representatives initially assured the average motorist that they need not be worried because police are alerted only if a car’s license plate number matches information in a federal national criminal database, known as the NCIC, or Amber/Silver Alert systems.

But leaving aside the potential for inaccuracies of the NCIC database and the problems that alone can cause, it is clear now that these systems are not as narrowly tailored as residents may expect. Concerns about overreach are only compounded by the acknowledgement of the expansive surveillance properties contained in, and the invasive measures allowed by, these technologies.

Specifically, investigators may input a wide variety of vehicle characteristics into the system which range far beyond license plates. In a now-deleted section of Flock Safety’s website, the company once flaunted that its surveillance system allowed police to search by “vehicle type, make, color, license plate state, missing/covered plates, and other unique features like *bumper stickers*, decals, and roof racks” (emphasis added). These capabilities are extraordinarily invasive, extending far beyond what most people imagine when they hear the term “automated license plate reader.”

Further, as the reference to “searches” suggests, the system does not merely operate passively. Police can input any license plate number – and presumably vehicle characteristics such as those noted above – and obtain information about a vehicle’s whereabouts, if captured by a camera, for the preceding 30 days.<sup>2</sup> These searches are not confined solely to a single jurisdiction. Searches include images from any Tiverton cameras, from any other municipality participating in the regional sharing network, and even camera systems located far outside Rhode Island.<sup>3</sup>

In fact, recent reports have revealed that Customs and Border Protection has conducted searches of Flock Safety’s ALPR databases across the country to enforce the Trump Administration’s anti-immigrant agenda.<sup>4</sup> At the same time, police departments have reportedly performed Flock Safety lookups on behalf of Immigration and Customs Enforcement (ICE), which does not have its own access.<sup>5</sup> While it is admirable that RISP has stated it will not cooperate with ICE and any ICE request for information, that does not mean that ICE cannot access this data another way. Based on the data sharing model established by Flock Safety, any other police department in the country with access to the RISP’s camera data could share it instead. For example, in another case, a police department in

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<sup>2</sup> Generally, Rhode Island jurisdictions that use ALPRs require data to be deleted after 30 days. This timeframe varies from state to state based on statutory limits. For example, Maine retains ALPR data for 21 days and New Hampshire requires the information to be deleted after three minutes. See <https://www.ncsl.org/technology-and-communication/automated-license-plate-readers-state-statutes>.

<sup>3</sup> For example, Woonsocket, RI shares camera data with many municipalities including Houston, TX. See <https://transparency.flocksafety.com/woonsocket-ri-pd>

<sup>4</sup> <https://www.404media.co/cbp-had-access-to-more-than-80-000-flock-ai-cameras-nationwide/>

<sup>5</sup> <https://www.404media.co/ice-taps-into-nationwide-ai-enabled-camera-network-data-shows/>

Texas used Flock Safety’s nationwide network to search more than 83,000 ALPR cameras to locate a woman suspected of having an abortion.<sup>6</sup>

Despite assurances that the alert system only triggers for vehicles linked to criminal activity and that innocent motorists thus have nothing to fear, one would assume that camera alerts would be few and far between. Yet, according to the transparency portal<sup>7</sup> set up for the Cranston Police Department, to give one example, those cameras have taken photographs of nearly *half a million cars* within the last thirty days. Each of those images remains available for police searches for that same timeframe.<sup>8</sup>

At the same time, the positing that these cameras operate solely based on the visual capturing of information is misleading. Flock Safety’s website advertises that their technologies have the ability to not only search by the aesthetic characteristics listed above but additionally by “audio evidence” and “contextual evidence,” which includes such evidence as “screeching tires” and “associated vehicles.”<sup>9</sup> This implies that these systems capture both audio and video, and utilize artificial intelligence to determine which vehicles in a certain area may be linked to one another. Both of these uses, beyond the already invasive capabilities of video capturing, would be a profound overreach of this technology and invite over-policing and an inappropriate broadening of surveillance techniques.

• **It is almost inevitable that the use of these cameras will expand over time to engage in more, and more intrusive, types of surveillance.** The history of surveillance technology in this country – from wiretaps to stingrays to cameras to drones – has been a history of ever-growing uses, and those expanded uses are then used to justify and normalize even greater intrusions on privacy. One common argument used to dismiss privacy concerns about installing these cameras is the widespread prevalence of surveillance in other areas. Not only does this gradually erode our expectations of privacy, but it also normalizes these surveillance progressions.

Flock Safety’s cameras exemplify this “mission creep.” In addition to the standard technology that Flock Safety provides, the company announced the availability of “advanced search” features for its camera systems that will:

- Allow police to upload a picture of a vehicle from any source and then perform a search to see if any of the cameras have seen it;
- Allow police to enter a license plate number, and then search cameras to find vehicles that frequently travel with that vehicle, to “help identify accomplices to crimes”; and
- Give police the ability to search for vehicles that have been in multiple specified locations recently.<sup>10</sup>

Even if not being used in these more expansive ways today, the potential capabilities of this program are not as narrow as simply identifying and cross-checking license plate numbers, and nothing

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<sup>6</sup> <https://www.404media.co/a-texas-cop-searched-license-plate-cameras-nationwide-for-a-woman-who-got-an-abortion/>

<sup>7</sup> Transparency portals are online portals created by Flock Safety to show the public certain metrics in the use of these systems. If this RISP camera is approved, a transparency portal should be created.

<sup>8</sup> <https://transparency.flocksafety.com/cranston-ri-pd>

<sup>9</sup> <https://www.flocksafety.com/>

<sup>10</sup> <https://www.govtech.com/biz/flock-safety-gives-users-expanded-vehicle-location-abilities>

prevents expanded uses in the future. The potential chilling effects on daily life as a result of the ability to track individuals in these manners cannot be understated.

• **In the absence of legislatively established limits on their use, the privacy rights of the public remain at the complete discretion of the police department and a private company, which can change their policies at any time.** No matter what assurances of privacy are given in policy – by either a police department or Flock Safety – there are no meaningful constraints on their ability to change the rules at any time.<sup>11</sup> Today we may be told, for example, that all photos will be destroyed after 30 days, but nothing prevents the law enforcement agencies or the company six months from now from extending it to 60 days, a year, or even a decade. The same is true for any other “safeguards” offered exclusively by police departmental policy or Flock Safety guidelines.

When police surveillance techniques like ALPRs are promoted, they often imply a false choice between public safety and privacy. But public safety is the result of community-based tools and systems that directly and tangibly support residents – it is not, and has never been, a result of indiscriminate 24/7 surveillance. To suggest that such surveillance technology is only a threat to those committing crimes is dismissive of the legitimate privacy concerns that all residents have and particularly ignores how police surveillance over the decades has often targeted communities in a racially discriminatory manner.

While the above are detailed concerns directly related to Flock Safety’s cameras and the specific implementation of them in your municipality, we wish to emphasize that all surveillance technology has the capability to encourage, intentionally or not, more aggressive and unduly invasive policing and to foster community distrust in policing systems. For all these reasons, we urge the Town Council to reject RISP’s request to install a Flock Safety camera in Tiverton and consider ending the existing contract with Flock Safety. Alternatively, we would encourage the Council to implement a strong ordinance governing the use of the town-owned cameras. We would be happy to offer recommendations in that regard.

Thank you for your consideration of these concerns. If you have any questions about our views, please feel free to let us know.

Sincerely,



Madalyn McGunagle  
Policy Associate

cc: Col. Darnell Weaver, RISP  
Col. James N. Costa, Chief of Police  
Patrick Jones, Town Administrator

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<sup>11</sup> Legislation intended to regulate the use and procurement of these systems has been introduced in the last few legislative sessions and have been held for further study in committee after facing opposition from law enforcement agencies. This year’s legislation includes new, explicit data sharing protections. See 2026-H 8077: <https://webserver.rilegislature.gov/BillText/BillText26/HouseText26/H8077.pdf>.