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July 22, 2026

Members of the South Kingstown Town Council
Town Hall
180 High Street
Wakefield, RI 02879

VIA EMAIL

Dear Town Councilors:

We understand that the Town Council will be having a discussion at its meeting on Monday about the Town's continued use of Flock Safety automated license plate readers (ALPRs). I am writing to express the ACLU of Rhode Island's serious concerns regarding these cameras. 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 urge you to cancel your contract with Flock Safety.

The Town's discussion comes at a particularly appropriate time following recent reports that the Federal Bureau of Investigation (FBI) issued a Request For Proposal seeking a vendor, like Flock Safety, that will allow the FBI access to ALPR data collected nationwide.¹ Increasingly, municipalities across the country, including jurisdictions in nearby Massachusetts and Connecticut, are terminating their contracts with Flock Safety.² For the Council's reference, we have included a list of some of the municipalities that have recently canceled Flock Safety contracts or rejected Flock Safety proposals due to concerns like those addressed in this letter. More locally, both Warren and Portsmouth recently rejected a request from the Rhode Island State Police to install ALPRs in their towns. Just last month, Little Compton indefinitely tabled a proposal to install ALPRs. The South Kingstown Town Council can – and we believe should – follow the lead of those municipalities moving away from this technology.

Our organization has substantive concerns about the technology of these cameras, but we are just as worried that these surveillance systems are being implemented without the concurrent implementation of statutory safeguards and limitations for their use. Our major concerns with more context are as follows:

- **The cameras capture more information than just license plate numbers.** ALPRs are often portrayed as law enforcement tools that merely capture photographs of license plates. However, this framing minimizes the actual strength of these cameras. In reality, ALPRs can reveal a lot about a person. When combined, the data generated by these systems can reveal remarkably personal details

¹ <https://www.newsweek.com/fbi-plan-license-plate-data-track-drivers-nationwide-11967352>

² See, <https://www.cambridgema.gov/news/2025/12/statementontheflocksafetyalprcontracttermination>; <https://www.wtnh.com/news/connecticut/hartford/some-connecticut-towns-opting-to-turn-off-automated-license-plate-reader-cameras-amid-privacy-concerns/>.

about individuals' lives, such as where a person attends religious services, where they work, where they sleep at night, what doctors they see, or where their children attend school.

Rhode Island's use of other ALPR systems – such as those utilized for tolling purposes or to enforce traffic violations – have generally been contained to capturing only the license plate on a vehicle, and only for a specific and narrow internal purpose. With Flock Safety ALPRs, investigators may input a wide variety of vehicle characteristics into the system, including searches by vehicle type, make, color, and other unique features like roof racks and even *bumper stickers*. 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 like other ALPR systems. With Flock Safety, police can input any license plate number – and vehicle characteristics such as those noted above – and obtain information about a vehicle's whereabouts, when captured by a camera, for the preceding 30 days.³ Notably, officers may input almost any reason when searching for a vehicle. We have seen numerous network and organizational audits that merely include vague references to “investigations” as reasons to search the system.⁴ Further, these searches are not confined solely to a single jurisdiction. Search results can include images not just from an ALPR located in South Kingstown, but potentially from any municipality participating in the nationwide sharing network, which includes camera systems located far outside Rhode Island.⁵

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.⁶ 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.⁷ Because of this data sharing model, any agency with access to Rhode Island's cameras could potentially share that information with other law enforcement agencies around the country, including ICE, notwithstanding a police department's assurance that *it* will not share the data with immigration officials.⁸

The nationwide misuses of this system do not stop there. Notably, this system has been utilized by police in other states to monitor protests, and by individual police officers to track former romantic partners.⁹ In another disturbing use of the cameras, a police department in Texas used Flock Safety's

³ 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 and Connecticut retain 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>.

⁴ A network audit is a list of all document searches of an agency's data conducted by outside users. An organizational audit is a list of internal searches of both the agency's data and the data of other agencies. <https://data.aclum.org/2025/10/07/flock-gives-law-enforcement-all-over-the-country-access-to-your-location/>

⁵ For example, Woonsocket, RI shares camera data with dozens of municipalities including Houston, TX. See <https://transparency.flocksafety.com/woonsocket-ri-pd>

⁶ <https://www.404media.co/cbp-had-access-to-more-than-80-000-flock-ai-cameras-nationwide/>

⁷ <https://www.404media.co/ice-taps-into-nationwide-ai-enabled-camera-network-data-shows/>

⁸ This should be particularly troubling for the Council, given that South Kingstown worked hard on enacting a strong immigrant protection ordinance in 2017. Notwithstanding the police department's policy, this fact alone presents the potential to undermine the effects of the ordinance.

⁹ See, e.g., <https://www.eff.org/deeplinks/2025/11/how-cops-are-using-flock-safety-s-alpr-network-surveil-protesters-and-activists>; <https://wisconsinexaminer.com/2026/03/13/wisconsin-communities-grapple-with-police->

nationwide network to search more than 83,000 ALPR cameras to locate a woman suspected of having an abortion.¹⁰ We have included a list of just some of the documented misuses of this system nationwide. Due to the lack of rigorous auditing procedures in many police departments, most misuses of the system remain unknown.

• **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.** There are no laws governing these systems in the State of Rhode Island. 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.¹¹ 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 from deciding six months from now to extend data retention 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.

In that regard, it is worth noting some recent and significant changes Flock Safety has made in their new 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.¹² 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, regardless of the 30-day retention period that is currently the standard in Rhode Island. The new contract terms also change the governing law from the state in which the customer is located to the State of Georgia, where Flock Safety is headquartered.

• **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 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.

Even if not being used in more expansive ways today, the potential capabilities of an ALPR are not as narrow as simply identifying and cross-checking license plate numbers, and nothing prevents expanded uses in the future. The potential chilling effects on daily life as a result of the ability to track individuals in this manner cannot be overstated.

[misuse-of-flock-surveillance/](https://www.404media.co/footage-shows-cop-stalking-woman-he-met-on-a-tv-set-after-surveilling-her-with-a-license-plate-reader/); <https://www.404media.co/footage-shows-cop-stalking-woman-he-met-on-a-tv-set-after-surveilling-her-with-a-license-plate-reader/>

¹⁰ <https://www.404media.co/a-texas-cop-searched-license-plate-cameras-nationwide-for-a-woman-who-got-an-abortion/>

¹¹ 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 strong opposition from law enforcement agencies. See 2026-H 8077: <https://webserver.rilegislature.gov/BillText/BillText26/HouseText26/H8077.pdf>.

¹² <https://www.flocksafety.com/legal/terms-and-conditions>

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 inaccuracies in the NCIC database and the problems that alone can cause, it is clear now that these systems are far from being narrowly tailored in their scope as the public has been led to believe.

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 portal¹³ 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.¹⁴

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. We know that public safety objectives can be met without sacrificing basic privacy protections or allowing unchecked 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. Ultimately, there should be no misunderstanding about the impact of Flock Safety technology: it constitutes the beginning of a nationwide surveillance network.

For all these reasons, we urge the Town Council to consider canceling South Kingstown's contract with Flock Safety. We would be happy to explain these issues in more detail or answer any questions you may have. Thank you for your consideration of these concerns.

Sincerely,



Madalyn McGunagle
Policy Associate

cc: James M. Manni, Town Administrator
Matthew Moynihan, Chief of Police

Enclosures

¹³ Transparency portals are online portals created by Flock Safety to show the public certain metrics in the use of these systems. The South Kingstown Police Department has chosen not to make use of one.

¹⁴ <https://transparency.flocksafety.com/cranston-ri-pd>

Cities That Have Ended Their Use of Flock (and other) ALPRs

State	Locality	Action	Date
Connecticut	Windsor	Cancelled Flock contract	7/15/26
Connecticut	Killingworth	Cancelled Flock contract	7/15/26
California	Los Angeles	Suspended Flock use to renegotiate stronger contract	7/11/26
Massachusetts	Framingham	Let Flock contract expire	6/25/26
Rhode Island	Little Compton	Indefinitely tabled Flock proposal	6/18/26
Maine	South Portland	Cancelled Flock contract	6/11/26
Ohio	Dayton	Indefinitely suspended Flock use	5/2/26
Wisconsin	Oshkosh	Cancelled Flock contract	4/23/26
Wisconsin	Dane County	Ended funding for Flock contract (effective termination)	4/19/26
Wisconsin	Sturgeon Bay	Did not renew Flock contract	4/15/26
Indiana	Bloomington	Cancelled Flock contract	4/15/26
New York	Tompkins County	Cancelled Flock contract	4/14/26
Massachusetts	Attleboro	Cancelled Flock contract	3/22/26
New York	Saranac Lake	Cancelled Flock contract	3/9/26
New York	Ithica	Cancelled Flock contract	3/8/26
Iowa	Coralville	Cancelled Flock contract	2/24/26
Colorado	Denver	Cancelled Flock contract; switched to Axon	2/23/26
Washington	Lynnwood	Cancelled Flock contract	2/23/26
Connecticut	Windsor	Temporarily paused Flock cameras	2/19/26
Arizona	South Tucson	Cancelled Flock contract	2/19/26
Missouri	Seneca	Cancelled Flock contract	2/19/26
National	n/a	Ring cancelled partnership with Flock	2/12/26
New York	Pine Plains	Nullified Flock contract	2/3/26
California	Mountain View	Discontinued use of Flock ALPRs	2/3/26
Washington	Prosser	Discontinued use of Flock	1/30/26
Massachusetts	Watertown	Canceled Flock contract	1/28/26
Rhode Island	Portsmouth	Rejected State Police Flock contract	1/28/26
California	Los Altos Hills	Removed all Flock ALPRs	1/27/26
New York	Syracuse	Removed all Flock cameras	1/26/26
Massachusetts	Greenfield	Removing all Flock cameras	1/22/26
Massachusetts	Natick	Terminated Flock pilot program	1/21/26
California	Santa Cruz	Cancelled Flock contract	1/13/26

Oregon	Bend	Turn off cameras and not renew contract	1/8/26
Washington	Walla Walla	Discontinued use of Flock	1/6/26
Virginia	Staunton	Canceled Flock contract	12/22/25
Arizona	Flagstaff	Canceled Flock contract	12/19/25
Virginia	Charlottesville	Discontinued use of Flock (at end of pilot program)	12/18/25
Texas	San Marcos	Declined to renew Flock contract	12/15/25
New York	Poestenkill	Rejected police request to install Flock ALPR	12/13/25
Colorado	Longmont	Declined to renew Flock contract	12/10/25
Massachusetts	Cambridge	Canceled Flock contract	12/10/25
Oregon	Lane County	Canceled Flock contract	12/10/25
Utah	Salt Lake City	Declined \$224,000 DOJ grant to fund Motorola/Vigilant ALPRs	12/10/25
California	Richmond	Shut off Flock cameras	12/9/25
Rhode Island	Warren	Rejected State Police Flock contract	12/9/25
Oregon	Eugene	Cancelled Flock contract	12/5/25
Oregon	Springfield	Ended use of Flock cameras	12/5/25
Washington	Mountlake Terrace	Canceled Flock contract	12/4/25
Oregon	Woodburn	Suspend use of Flock (for at least 60 days)	11/13/25
Washington	Skamania County	Discontinued use of Flock	11/13/25
Wisconsin	Verona	Declined to renew Flock contract	11/11/25
North Carolina	Hillsborough	Canceled Flock contract	11/10/25
Texas	Hays County	Cancelled Flock contract	10/14/25
Arizona	Sedona	Canceled Flock contract	9/10/25
Illinois	Evanston	Cancelled Flock contract	8/26/25
Illinois	Oak Park	Canceled Flock contract	8/7/25
New York	Scarsdale	Canceled Flock contract	8/6/25
Texas	Austin	Cancelled Flock contract	6/6/25

Flock Known Misuses

Tracking Former Partners and Other Individuals:

- August 17, 2024- [Kansas Police Chief Used Flock License Plate Cameras 164 Times to Track Ex-Girlfriend.](#)
- November 3, 2025- [License Plate Surveillance Logs Reveal Racist Policing Against Romani People.](#)
- December 3, 2025- [Georgia Police Chief, Arrested for Using Flock Cameras for Stalking and Harassment, Searched Capitola \(CA\) Data Earlier This Year.](#)
- February 25, 2026- [Milwaukee Police Officer Charged in Flock Camera Misuse Case.](#)
 - Used cameras to track someone officer was dating and that person's ex-partner.
- March 26, 2026- [Police Used Flock to Give a Man a Traffic Ticket.](#)
- May 26, 2026- [ALPR data used to conduct school district "residency verifications," as part of employment background checks, and to investigate noise complaints.](#)
- July 16, 2026- [Police Have Reportedly Used License Plate Readers to Stalk Romantic Interests at Least 24 Times in Recent Years.](#)

Monitoring Protestors:

- November 20, 2025- [Cops Used Flock to Monitor No Kings Protests Around the Country.](#)
- November 20, 2025- [How Cops Are Using Flock Safety's ALPR Network to Surveil Protestors and Activists.](#)

Sharing with Federal Agencies:

- May 27, 2025- [ICE Taps into Nationwide AI-Enabled Camera Network, Data Shows.](#)
- July 9, 2025- [Richmond Police Chief Apologizes for February ATF Access Grant to Flock System.](#)
- August 12, 2025- [Feds Used Local Cop's Password to Do Immigration Surveillance with Flock Cameras.](#)
- August 25, 2025- [CBP Had Access to More than 80,000 Flock AI Cameras Nationwide.](#)
- August 25, 2025- [Company Violated Illinois Law by Sharing License Plate Data with Federal Agency.](#)
- October 16, 2025- [ICE, Secret Service, Navy All Had Access to Flock's Nationwide Network of Cameras.](#)
- April 6, 2026- [Wildlife Conservation Police Are Searching Thousands of Flock Cameras for ICE.](#)

Monitoring Reproductive Rights:

- October 7, 2025- [Police Said they Surveilled Woman Who Had Abortion for Her "Safety." Court Records Show they Considered Charging Her with a Crime.](#)