



CITY OF BLOOMINGTON

COMMISSION ON SUSTAINABILITY

MEMORANDUM

To: Members of the Bloomington Commission on Sustainability
From: Justin Vasel, Alex Jorck, Zach Ammerman
Date: February 5, 2026
Subject: Introduction of Resolution 2026-02 Concerning Automated License Plate Reader Surveillance

Purpose

We are introducing Resolution 2026-02 for the Commission's consideration at its upcoming meeting. This memo provides context for the resolution and summarizes its recommendations.

Why This Belongs on Our Agenda

BMC 2.12.100 establishes this Commission to advance sustainable policies across environmental, social, and economic dimensions, with the UN Sustainable Development Goals guiding our work. Resolution 2026-02 addresses the social dimension of sustainability—specifically, how mass surveillance technologies affect community trust, democratic participation, and the transparent governance that SDG 16 requires. Our statute also empowers us to advise on policies affecting community resilience, which depends on residents feeling safe to organize, attend public meetings, and engage in civic life.

What the Resolution Does

The resolution makes findings that mass surveillance implicates social sustainability and falls within our statutory mandate, and that the national record demonstrates policy safeguards have proven insufficient to prevent misuse.

It recommends that the Common Council conduct a public hearing on the Flock deployment and adopt a Community Control Over Police Surveillance (CCOPS) ordinance, modeled on the ACLU's April 2024 Model Bill, requiring Council approval before any city agency funds, acquires, or uses surveillance technology.

It recommends that the City Administration disable the cameras, decline to renew the contract, and disclose camera locations, data-sharing arrangements, and a full accounting of system usage.

A Statement of Values section acknowledges legitimate public safety concerns while clarifying that our concerns are structural—about participating in a

nationwide surveillance network—rather than directed at the Bloomington Police Department.

Why Now?

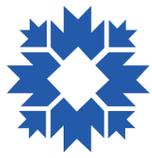
The national landscape has shifted significantly. At least 23 municipalities have canceled, paused, or rejected Flock contracts since February 2025. Federal legislators have requested an FTC investigation. Security researchers documented 51 vulnerabilities, and journalists demonstrated cameras were exposed to the open internet. Illinois found Flock violated state law by sharing data with federal immigration authorities. We believe the Commission should make its voice heard while there is still an opportunity to influence the City's approach.

Our Request

We ask that commissioners review the resolution before the meeting and come prepared to discuss. We welcome questions, suggested amendments, and debate.

Justin Vasel, BCOS Chair
Alex Jorck, BCOS Commissioner
Zach Ammerman, BCOS Commissioner

Encl: BCOS Resolution 2026-02 (Draft)



Sponsors:

Justin Vasel
Alex Jorck
Zach Ammerman

RESOLUTION 2026-02

**CONCERNING AUTOMATED LICENSE PLATE READER SURVEILLANCE
TECHNOLOGY AND ITS IMPLICATIONS FOR SOCIAL SUSTAINABILITY,
COMMUNITY RESILIENCE, AND THE UNITED NATIONS SUSTAINABLE
DEVELOPMENT GOALS**

- WHEREAS, Bloomington Municipal Code Section 2.12.100 establishes the Bloomington Commission on Sustainability to "promote and advance sustainable policies and practices in Bloomington across environmental, social, and economic dimensions"; and
- WHEREAS, BMC 2.12.100 further provides that "The United Nations Sustainable Development Goals (SDGs) provide a more detailed and comprehensive framework for organizing and prioritizing sustainability goals and actions" and that "The SDGs shall guide the commission's work"; and
- WHEREAS, BMC 2.12.100(8)(B) empowers the Commission to "advise and make recommendations to the Bloomington Common Council, city administration, and city boards and commissions on policies and programs that infuse the work of city government with an operating philosophy based on sustainability and community resilience"; and
- WHEREAS, the social pillar of sustainability encompasses equity, justice, democratic participation, community cohesion, and the protection of human rights, all of which are necessary conditions for achieving environmental and economic sustainability goals; and
- WHEREAS, United Nations Sustainable Development Goal 16 ("Peace, Justice and Strong Institutions") calls upon signatories to "promote the rule of law at the national and international levels and ensure equal access to justice for all" (Target 16.3), to "develop effective, accountable and transparent institutions at all levels" (Target 16.6), to "ensure responsive, inclusive, participatory and representative decision-making at all levels" (Target 16.7), and to "ensure public access to information and protect fundamental freedoms" (Target 16.10); and

WHEREAS, the City of Bloomington contracted with Flock Group Inc. ("Flock Safety") for the deployment of roughly 40 automated license plate reader (ALPR) cameras and associated subscription services; and

WHEREAS, Flock Safety operates a nationwide surveillance network comprising more than 80,000 cameras across more than 5,000 communities in 49 states, performing more than 20 billion vehicle scans monthly, with more than 75 percent of its approximately 5,000 law enforcement agency customers participating in cross-jurisdictional data sharing that allows officers to search license plate records captured anywhere in the network without a warrant; and

WHEREAS, Flock's technology captures not only license plate numbers but also detailed vehicle characteristics including make, model, color, body type, bumper stickers, damage patterns, and whether plates are missing or covered, enabling searches by vehicle description even without plate information; and

WHEREAS, federal inquiries and security experts have identified significant cybersecurity vulnerabilities within Flock Safety's infrastructure, including at least 35 compromised customer accounts, 51 separate security vulnerabilities¹, and documented negligence in protecting sensitive data from unauthorized access or manipulation²; and

WHEREAS, Senator Ron Wyden and Representative Raja Krishnamoorthi requested a Federal Trade Commission investigation of Flock Safety in November 2025³, citing compromised accounts and negligent cybersecurity practices; and

WHEREAS, the consolidation of sensitive movement data into a vulnerable, privately-managed network creates a systemic risk of exploitation by unauthorized parties, which can facilitate stalking, harassment, or other criminal activities, thereby undermining the community trust and resilience essential to sustainable governance; and

WHEREAS, investigations by the Electronic Frontier Foundation, 404 Media, Senator Ron Wyden, and other researchers have documented that federal agencies including Immigration and Customs Enforcement (ICE)⁴, the Secret Service, and the Naval Criminal Investigative Service have accessed Flock's nationwide camera network⁵, despite Flock's ongoing assurances to local customers that no such federal access exists⁶; and

¹ *Examining the Security Posture of an Anti-Crime Ecosystem v1.2-PR*, GainSec (Nov 11, 2025) (Online at https://github.com/GainSec/anti-crime-ecosystem-research/blob/main/whitepaper/GainSec_Whitepaper_AntiCrimeEcosystem.pdf)

² *Flock Exposed its AI-Powered Cameras to the Internet. We Tracked Ourselves.*, 404 Media (Dec 22, 2025) (Online at <https://www.404media.co/flock-exposed-its-ai-powered-cameras-to-the-internet-we-tracked-ourselves/>)

³ Letter from Sen. Wyden and Rep. Krishnamoorthi to FTC Chair (Nov 3, 2025) (Online at https://www.wyden.senate.gov/imo/media/doc/wyden_letter_to_ftc_on_flockpdf.pdf)

⁴ *ICE Taps Into Nationwide AI-Enabled Camera Network, Data Show*, 404 Media (May 27, 2025) (Online at <https://www.404media.co/ice-taps-into-nationwide-ai-enabled-camera-network-data-shows/>)

⁵ *ICE, Secret Service, Navy All Had Access to Flock's Nationwide Network of Cameras*, 404 Media (Oct 16, 2026) (Online at <https://www.404media.co/ice-secret-service-navy-all-had-access-to-flocks-nationwide-network-of-cameras/>)

⁶ *Does Flock Share Data with ICE or Federal Agencies?*, Flock Safety Blog (Jan 6, 2026) (Online at <https://www.flocksafety.com/blog/does-flock-share-data-with-ice-or-federal-agencies>)

WHEREAS, documented uses of Flock camera data nationally include: tracking of a woman suspected of obtaining an abortion in Johnson County, Texas⁷; monitoring of political protests and demonstrations in Tulsa, Oklahoma and elsewhere⁸; searches using discriminatory and ethnically derogatory language⁹; and stalking of individuals by law enforcement officers¹⁰, including a Georgia police chief arrested in November 2025 for using Flock cameras to harass multiple victims¹¹; and

WHEREAS, data from Oak Park, Illinois revealed that 84% of Flock-related traffic stops involved Black drivers in a community where Black residents comprise only 19% of the population¹², raising serious concerns about racially disparate impacts; and

WHEREAS, the State of Illinois found that Flock violated state law by allowing Customs and Border Protection access to Illinois ALPR data¹³, prompting the City of Evanston, Illinois to terminate its Flock contract in August 2025¹⁴; and

WHEREAS, at least 23 municipalities have canceled, paused, or rejected Flock contracts since February 2025¹⁵, including Austin, Texas¹⁶; Cambridge, Massachusetts¹⁷; Eugene and Springfield, Oregon¹⁸; and Sedona, Arizona¹⁹, citing concerns about federal data sharing, civil liberties, transparency, and community trust; and

WHEREAS, sustainable governance requires that residents feel safe to organize, attend public meetings, speak at hearings, and engage in civic life without fear of surveillance, and the Commission's own work on food resilience, climate action, housing, and

⁷ *Flock Safety and Texas Sheriff Claimed License Plate Search Was for a Missing Person. It Was an Abortion Investigation.*, Electronic Frontier Foundation (Oct 7, 2025) (Online at

<https://www.eff.org/deeplinks/2025/10/flock-safety-and-texas-sheriff-claimed-license-plate-search-was-missing-person-it>)

⁸ *How Cops Are Using Flock Safety's ALPR Network to Surveil Protesters and Activists*, Electronic Frontier Foundation (Nov 20, 2025) (Online at

<https://www.eff.org/deeplinks/2025/11/how-cops-are-using-flock-safety-s-alpr-network-surveil-protesters-and-activists>)

⁹ *License Plate Surveillance Logs Reveal Racist Policing Against Romani People*, Electronic Frontier Foundation (November 3, 2025) (Online at

<https://www.eff.org/deeplinks/2025/11/license-plate-surveillance-logs-reveal-racist-policing-against-romani-people>)

¹⁰ *Sedgwick police chief tracked ex-girlfriend 164 times using license plate cams*, KAKE (Aug 18, 2024) (Online at

https://www.kake.com/home/sedgwick-police-chief-tracked-ex-girlfriend-164-times-using-license-plate-cams/article_21fdfdb5-de5-11ef-95c4-8be8baa3f10c.html)

¹¹ *Georgia police chief charged with using license plate readers to stalk and harass people*, Associated Press (Nov 20, 2025)

(Online at <https://apnews.com/article/georgia-plate-readers-stalk-harass-chief-arrested-39adb6f89fc2074da61f2801fef3f180>)

¹² *84% of drivers stopped by Oak Park police in Flock traffic stops were Black*, Freedom to Thrive Oak Park (Apr 16, 2024)

(Online at

<https://www.freedomtothriveop.com/blog/84-of-the-drivers-stopped-by-oak-park-police-in-a-flock-traffic-stops-were-black>)

¹³ *Giannoulis' Audit Finds License Plate Reader Company in Violation of State Law: Flock Safety Shared Illinois Data with U.S. Customs and Border Protection. Secretary Orders Flock to Shut off Data Access*, Illinois Office of the Secretary of State (Aug 25, 2025) (Online at <https://www.ilsos.gov/content/dam/news/2025/august/250825d1.pdf>)

¹⁴ *City Deactivates Flock Cameras & Terminates Contract*, City of Evanston, IL Press Release (Aug 27, 2025) (Online at:

<https://www.cityofevanston.org/Home/Components/News/News/6676/249>)

¹⁵ *Procurement Power—When Cities Realized They Can Just Say No: 2025 in Review*, Electronic Frontier Foundation (Dec 28, 2025) (Online at

<https://www.eff.org/deeplinks/2025/12/procurement-power-when-cities-realized-they-can-just-say-no-2025-review>)

¹⁶ *Hays County Votes to Terminate Flock Safety Contracts in 3-2 Vote*, KXAN (Oct 14, 2025) (Online at

<https://www.kxan.com/news/hays-county-votes-to-terminate-flock-safety-contracts-in-3-2-vote/>)

¹⁷ *Statement on the Flock Safety ALPR Contract Termination*, City of Cambridge (Dec 10, 2025) (Online at

<https://www.cambridgema.gov/news/2025/12/statementontheflocksafetyalprcontracttermination>)

¹⁸ *Eugene and Springfield both announce end of Flock camera usage*, OPB (Dec 6, 2025) (Online at

<https://www.opb.org/article/2025/12/06/eugene-springfield-end-flock-cameras/>)

¹⁹ *Sedona Rejects License Plate Readers, Removes Flock Safety Cameras*, AZ Central (Oct 5, 2025) (Online at

<https://www.azcentral.com/story/news/local/arizona/2025/10/05/sedona-removes-flock-safety-license-plate-readers/86268179007>

other sustainability priorities depends upon robust community participation and advocacy; and

WHEREAS, peer-reviewed research has found that awareness of public surveillance cameras is negatively associated with perceived neighborhood cohesion, suggesting that surveillance infrastructure may accelerate the erosion of community social bonds,²⁰ and the International Association of Chiefs of Police has acknowledged that ALPR systems produce “a chilling effect on social and political activities”, and can cause people to “become more cautious in the exercise of their protected rights of expression, protest, association, and political participation because they consider themselves under constant surveillance”²¹; and

WHEREAS, the core principle of sustainability—meeting present needs without compromising the ability of future generations to meet their own needs—applies not only to environmental resources but also to democratic institutions, civil liberties, and the relationship of trust between government and residents; and

WHEREAS, surveillance infrastructure, once deployed and normalized, is historically difficult to dismantle, and decisions made today about the acceptable scope of government monitoring will shape the civil liberties environment that future Bloomington residents inherit; and

WHEREAS, community resilience—a concept explicitly referenced in the Commission's statutory authority—depends upon trust between residents and government, social cohesion, and the willingness of community members to engage with civic institutions, all of which are undermined when residents reasonably fear that their movements are being tracked and their data shared with unknown agencies for unknown purposes; and

WHEREAS, environmental justice communities—those disproportionately burdened by environmental harms—are frequently the same communities subjected to disproportionate surveillance, and the Commission cannot credibly advance environmental equity while remaining silent on surveillance practices that burden the same populations; and

WHEREAS, the precautionary principle²², widely embraced in sustainability practice, counsels that when an action raises threats of harm, precautionary measures should be taken even if cause-and-effect relationships are not fully established, and the documented harms associated with ALPR surveillance warrant precautionary restraint; and

WHEREAS, transparency and public deliberation are foundational to accountable institutions under SDG 16, and the procurement of surveillance technology through

²⁰ Takagi, et al (2020). *What Do Security Cameras Provide for Society? The Influence of Cameras in Public Spaces in Japan on Perceived Neighborhood Cohesion and Trust*. Journal of Experimental Criminology, 17, 477-464.
<https://doi.org/10.1007/s11292-020-09437-8>

²¹ *Privacy Impact Assessment Report for the Utilization of License Plate Readers*, International Association of Chiefs of Police (2009) (Online at https://www.theiacp.org/sites/default/files/all/k-m/LPR_Privacy_Impact_Assessment.pdf)

²² *The Precautionary Principle*, International Institute for Sustainable Development (Oct 2022) (Online at <https://www.iisd.org/system/files/2020-10/still-one-earth-precautionary-principle.pdf>)

sole-source contracting without public notice or council deliberation does not reflect the participatory decision-making that sustainable governance requires.

NOW THEREFORE, BE IT HEREBY RESOLVED BY THE BLOOMINGTON COMMISSION ON SUSTAINABILITY, THAT:

SECTION 1. Findings

The Commission finds that:

- (a) Mass surveillance technologies, including automated license plate reader systems, implicate the social dimension of sustainability and fall within the Commission's statutory mandate to advise on policies affecting sustainability and community resilience.
- (b) The deployment of ALPR surveillance systems raises substantial concerns under United Nations Sustainable Development Goal 16, which the Commission is statutorily directed to apply in guiding its work.
- (c) The documented national record of ALPR misuse—including immigration enforcement, reproductive healthcare surveillance, protest monitoring, racially discriminatory application, and abuse by individual officers—demonstrates that policy safeguards and audit mechanisms have proven insufficient to prevent harm.
- (d) Participation in nationwide data-sharing networks creates risks that local policy controls cannot adequately mitigate, as data collected in Bloomington may be accessed by agencies and for purposes over which the City has no authority.
- (e) The procurement of surveillance technology without public deliberation is inconsistent with the transparent, participatory, and accountable governance that SDG 16 requires and that sustainable policymaking depends upon.

SECTION 2. Recommendations to the Common Council

The Commission respectfully recommends that the Bloomington Common Council:

- (a) Conduct a full public hearing on the Flock deployment, including testimony from civil liberties organizations, affected community members, and independent experts.
- (b) Introduce and adopt a Community Control Over Police Surveillance (CCOPS)²³ ordinance modeled on the ACLU's April 2024 Model Bill²⁴, requiring Council approval before any city agency funds, acquires, or uses surveillance technology. The ordinance should apply retroactively, requiring approval of existing surveillance technology within 180 days or cessation of use.

SECTION 3. Recommendations to the City Administration

The Commission respectfully recommends that the City Administration:

- (a) Disable all currently deployed Flock cameras in Bloomington, and do not renew contracts with Flock Safety.
- (b) Publicly disclose the locations of all Flock cameras currently deployed in Bloomington.
- (c) Disclose what data-sharing arrangements are currently in effect and which agencies have access to data collected from Bloomington cameras.

²³ Community Control Over Police Surveillance (CCOPS), American Civil Liberties Union (Online at <https://www.aclu.org/community-control-over-police-surveillance>)

²⁴ Model Bill: An Act to Promote Transparency and Protect Civil Rights and Civil Liberties With Respect to Surveillance Technology, American Civil Liberties Union (April 2024) (Online at: <https://assets.aclu.org/live/uploads/2023/08/ACLU-CCOPS-Model-Bill-April-2024.pdf>)

- (d) Provide a full accounting of how ALPR data has been used since deployment, including the number of searches conducted, the purposes documented, and any instances of data sharing with federal agencies or out-of-state law enforcement.
- (e) Ensure that any future consideration of surveillance technology procurement includes notification to relevant city boards and commissions and opportunity for public comment before contracts are executed.

SECTION 4. Statement of Values

The Commission affirms that:

- (a) Safe communities are sustainable communities, and the Commission does not dismiss legitimate public safety concerns.
- (b) However, public safety and civil liberties are not inherently in conflict, and Bloomington should pursue safety strategies that do not require mass surveillance of residents' movements.
- (c) The Commission's concerns are not with the Bloomington Police Department's actions or intentions, but with the structural risks inherent in participating in nationwide surveillance networks controlled by private corporations and accessible to federal agencies.
- (d) Intergenerational responsibility requires that we consider not only the immediate utility of technologies but also the long-term implications for the kind of community we are building and the civil liberties infrastructure we leave to future residents.

SECTION 5. Transmittal

The Chair is directed to transmit copies of this Resolution to the Mayor, all members of the Common Council, the City Clerk, the Corporation Counsel, the Chief of Police, the Board of Public Safety, and the Bloomington/Monroe County Human Rights Commission.

PASSED AND ADOPTED by the Bloomington Commission on Sustainability upon this ___ day of _____, 2026.

JUSTIN VASEL, Chair
Bloomington Commission on Sustainability

The views expressed here are solely those of the Bloomington Commission on Sustainability, as approved in their public meetings, and do not necessarily reflect the views, policies, or positions of the City of Bloomington. Only the Office of the Mayor has the authority to issue policy statements on behalf of the Executive Branch of the City of Bloomington.