



# 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 Vassel, BCOS Chair  
Alex Jorck, BCOS Commissioner  
Zach Ammerman, BCOS Commissioner

*Encl: BCOS Resolution 2026-02 (Draft)*



# CITY OF BLOOMINGTON

## COMMISSION ON SUSTAINABILITY

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Passed X-Y-Z

2 Sponsors:

3 Justin Vasel

4 Alex Jorck

5 Zach Ammerman

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### RESOLUTION 2026-02

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

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11 WHEREAS, Bloomington Municipal Code Section 2.12.100 establishes the Bloomington  
12 Commission on Sustainability to "promote and advance sustainable policies and  
13 practices in Bloomington across environmental, social, and economic  
14 dimensions"; and

15 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

19 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

24 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

28 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

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

38 WHEREAS, Flock Safety operates a nationwide surveillance network comprising more than  
39 80,000 cameras across more than 5,000 communities in 49 states, performing  
40 more than 20 billion vehicle scans monthly, with more than 75 percent of its  
41 approximately 5,000 law enforcement agency customers participating in  
42 cross-jurisdictional data sharing that allows officers to search license plate records  
43 captured anywhere in the network without a warrant; and

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

48 WHEREAS, federal inquiries and security experts have identified significant cybersecurity  
49 vulnerabilities within Flock Safety's infrastructure, including at least 35  
50 compromised customer accounts, 51 separate security vulnerabilities<sup>1</sup>, and  
51 documented negligence in protecting sensitive data from unauthorized access or  
52 manipulation<sup>2</sup>; and

53 WHEREAS, Senator Ron Wyden and Representative Raja Krishnamoorthi requested a Federal  
54 Trade Commission investigation of Flock Safety in November 2025<sup>3</sup>, citing  
55 compromised accounts and negligent cybersecurity practices; and

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

61 WHEREAS, investigations by the Electronic Frontier Foundation, 404 Media, Senator Ron  
62 Wyden, and other researchers have documented that federal agencies including  
63 Immigration and Customs Enforcement (ICE)<sup>4</sup>, the Secret Service, and the Naval  
64 Criminal Investigative Service have accessed Flock's nationwide camera  
65 network<sup>5</sup>, despite Flock's ongoing assurances to local customers that no such  
66 federal access exists<sup>6</sup>; and

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<sup>1</sup> Examining the Security Posture of an Anti-Crime Ecosystem v1.2-PR, GainSec (Nov 11, 2025) (Online at  
72 [https://github.com/GainSec/anti-crime-ecosystem-research/blob/main/whitepaper/GainSec\\_Whitepaper\\_AntiCrimeEcosystem.pdf](https://github.com/GainSec/anti-crime-ecosystem-research/blob/main/whitepaper/GainSec_Whitepaper_AntiCrimeEcosystem.pdf)  
73 f)

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

<sup>3</sup> Letter from Sen. Wyden and Rep. Krishnamoorthi to FTC Chair (Nov 3, 2025) (Online at  
70 [https://www.wyden.senate.gov/imo/media/doc/wyden\\_letter\\_to\\_ftc\\_on\\_flockpdf.pdf](https://www.wyden.senate.gov/imo/media/doc/wyden_letter_to_ftc_on_flockpdf.pdf))

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

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

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

74 WHEREAS, documented uses of Flock camera data nationally include: tracking of a woman  
75 suspected of obtaining an abortion in Johnson County, Texas<sup>7</sup>; monitoring of  
76 political protests and demonstrations in Tulsa, Oklahoma and elsewhere<sup>8</sup>; searches  
77 using discriminatory and ethnically derogatory language<sup>9</sup>; and stalking of  
78 individuals by law enforcement officers<sup>10</sup>, including a Georgia police chief  
79 arrested in November 2025 for using Flock cameras to harass multiple victims<sup>11</sup>;  
80 and

81 WHEREAS, data from Oak Park, Illinois revealed that 84% of Flock-related traffic stops  
82 involved Black drivers in a community where Black residents comprise only 19%  
83 of the population<sup>12</sup>, raising serious concerns about racially disparate impacts; and

84 WHEREAS, the State of Illinois found that Flock violated state law by allowing Customs and  
85 Border Protection access to Illinois ALPR data<sup>13</sup>, prompting the City of Evanston,  
86 Illinois to terminate its Flock contract in August 2025<sup>14</sup>, and

87 WHEREAS, at least 23 municipalities have canceled, paused, or rejected Flock contracts since  
88 February 2025<sup>15</sup>, including Austin, Texas<sup>16</sup>; Cambridge, Massachusetts<sup>17</sup>; Eugene  
89 and Springfield, Oregon<sup>18</sup>; and Sedona, Arizona<sup>19</sup>, citing concerns about federal  
90 data sharing, civil liberties, transparency, and community trust; and

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

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<sup>7</sup> *Flock Safety and Texas Sheriff Claimed License Plate Search Was for a Missing Person. It Was an Abortion Investigation.*,  
113 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>

<sup>8</sup> *How Cops Are Using Flock Safety's ALPR Network to Surveil Protesters and Activists*, Electronic Frontier Foundation (Nov 20,  
111 2025) (Online at

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

<sup>9</sup> *License Plate Surveillance Logs Reveal Racist Policing Against Romani People*, Electronic Frontier Foundation (November 3,  
109 2025) (Online at

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

<sup>10</sup> *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\\_21fdfdba-5](https://www.kake.com/home/sedgwick-police-chief-tracked-ex-girlfriend-164-times-using-license-plate-cams/article_21fdfdba-5)

[dc5-11ef-95c4-8be8baa3f10c.html](https://www.kake.com/home/sedgwick-police-chief-tracked-ex-girlfriend-164-times-using-license-plate-cams/article_21fdfdba-5)

<sup>11</sup> *Georgia police chief charged with using license plate readers to stalk and harass people*, Associated Press (Nov 20, 2025)  
106 (Online at <https://apnews.com/article/georgia-plate-readers-stalk-harass-chief-arrested-39adb6f89fc2074da61f2801fe3f180>)

<sup>12</sup> *84% of drivers stopped by Oak Park police in Flock traffic stops were Black*, Freedom to Thrive Oak Park (Apr 16, 2024)  
104 (Online at

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

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

<sup>14</sup> *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>

<sup>15</sup> *Procurement Power—When Cities Realized They Can Just Say No: 2025 in Review*, Electronic Frontier Foundation (Dec 28,  
99 2025) (Online at

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

<sup>16</sup> *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/>

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

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

<sup>18</sup> *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/>

<sup>19</sup> *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>

95 )

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

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

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

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

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

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

144 WHEREAS, the precautionary principle<sup>22</sup>, widely embraced in sustainability practice, counsels  
145 that when an action raises threats of harm, precautionary measures should be  
146 taken even if cause-and-effect relationships are not fully established, and the  
147 documented harms associated with ALPR surveillance warrant precautionary  
148 restraint; and

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

<sup>20</sup> 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.

<sup>21</sup> <https://doi.org/10.1007/s11292-020-09437-8>

<sup>22</sup> *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](https://www.theiacp.org/sites/default/files/all/k-m/LPR_Privacy_Impact_Assessment.pdf))

<sup>22</sup> *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>)

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

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

159 SECTION 1. Findings

160 The Commission finds that:

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

177 SECTION 2. Recommendations to the Common Council

178 The Commission respectfully recommends that the Bloomington Common Council:

- 179 (a) Conduct a full public hearing on the Flock deployment, including testimony from civil  
180 liberties organizations, affected community members, and independent experts.
- 181 (b) Introduce and adopt a Community Control Over Police Surveillance (CCOPS)<sup>23</sup>  
182 ordinance modeled on the ACLU's April 2024 Model Bill<sup>24</sup>, requiring Council approval  
183 before any city agency funds, acquires, or uses surveillance technology. The ordinance  
184 should apply retroactively, requiring approval of existing surveillance technology within  
185 180 days or cessation of use.

186 SECTION 3. Recommendations to the City Administration

187 The Commission respectfully recommends that the City Administration:

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

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

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

196 (d) Provide a full accounting of how ALPR data has been used since deployment, including  
197 the number of searches conducted, the purposes documented, and any instances of data  
198 sharing with federal agencies or out-of-state law enforcement.

199 (e) Ensure that any future consideration of surveillance technology procurement includes  
200 notification to relevant city boards and commissions and opportunity for public comment  
201 before contracts are executed.

202 SECTION 4. Statement of Values

203 The Commission affirms that:

204 (a) Safe communities are sustainable communities, and the Commission does not dismiss  
205 legitimate public safety concerns.

206 (b) However, public safety and civil liberties are not inherently in conflict, and Bloomington  
207 should pursue safety strategies that do not require mass surveillance of residents'  
208 movements.

209 (c) The Commission's concerns are not with the Bloomington Police Department's actions or  
210 intentions, but with the structural risks inherent in participating in nationwide  
211 surveillance networks controlled by private corporations and accessible to federal  
212 agencies.

213 (d) Intergenerational responsibility requires that we consider not only the immediate utility of  
214 technologies but also the long-term implications for the kind of community we are  
215 building and the civil liberties infrastructure we leave to future residents.

216 SECTION 5. Transmittal

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

220 PASSED AND ADOPTED by the Bloomington Commission on Sustainability upon this \_\_\_\_ day  
221 of \_\_\_\_\_, 2026.

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223 JUSTIN VASEL, Chair  
224 Bloomington Commission on Sustainability

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