



CITY OF MILWAUKEE

City Hall, 200 E. Wells Street, Milwaukee, WI 53202 • www.city.milwaukee.gov

March 11, 2026

The Honorable,
Members of the Milwaukee Board of Fire and Police Commissioners.

Re: Urgent Concerns Regarding Flock and Other Surveillance Technology in Milwaukee

Dear FPC Members:

We write to express serious concern regarding the use of license plate readers (LPRs) from Flock Safety and the lack of adequate guardrails, auditing, supervision, and transparency surrounding their use.

Recent reports that a Police Officer repeatedly misused these tools for stalking are alarming and underscore a systemic oversight gap rather than an isolated failure.
(1)

When powerful surveillance systems exist without strong, enforceable audit protocols and independent oversight, the risk of abuse is not theoretical — it is foreseeable.

These readers are capable of tracking movement patterns, identifying vehicles, and storing sensitive location data. Without clear usage restrictions, robust supervision, and meaningful consequences for misuse, they can be weaponized against residents, including survivors of domestic violence, journalists, advocates, and everyday community members. This creates a chilling effect on civil liberties and erodes public trust in law enforcement and city government.

The public was assured that these systems would be used responsibly and only for legitimate public safety purposes. However, the recent incident demonstrates that existing safeguards are insufficient and raises critical questions that require immediate public clarification:

- What specific training is provided before anyone is granted access to the department's LDRs and similar technology?
- How is ongoing use supervised in real time, and who is responsible for reviewing searches and access logs?
- How frequently are audits conducted, and are they proactive or only triggered after a complaint?
- What independent body oversees compliance and investigates misuse?

- What disciplinary policies exist for violations, and are they consistently enforced?
- What safeguards are in place to ensure these systems are not used for immigration enforcement without a judicial warrant?
- How is the City ensuring compliance with local policies, state law, and constitutional protections regarding data access and surveillance?

At minimum, the City of Milwaukee should immediately implement the following reforms:

- **Independent auditing and meaningful review thresholds.** Milwaukee's LPR SOP already mandates monthly internal audits. An independent audit requirement would add value if it is structurally outside the chain that is being audited and uses clear test criteria such as randomized sampling plus mandatory review of high-risk patterns. The misuse case illustrates that audit protocols must be capable of detecting repeated targeted monitoring, not just technically confirming that a required field was filled in.
- **Purpose limitation tied to documented casework.** Milwaukee's SOP requires case or CAD numbers and an explanation tied to specific query types. The alleged misuse shows that "labels" can still be laundered into legitimacy without enforceable validation. Strengthening this is less about adding more text boxes and more about building rules that prevent obviously noncompliant queries from being executed and ensuring the department can demonstrate enforcement.
- **Real-time flagging and supervisory escalation.** Milwaukee's SOP generally does not require per-search approvals for stored data access. If the city wants real-time supervision, the most feasible approach is not blanket pre-approval (which can cripple legitimate investigations), but tiered escalation: predefined scenarios where supervisor approval is required or where the system generates mandatory review.
- **A clear firewall for immigration enforcement in LPR-specific policy.** Milwaukee's immigration SOP restricts cooperation with ICE absent a judicial warrant and qualifying circumstances. To make that meaningful in a surveillance context, the LPR SOP should explicitly prohibit LPR searches and data sharing for civil immigration enforcement absent the same judicial-warrant threshold and should require documentation sufficient for later audit.
- **Transparency reporting that can be audited externally.** Reporting should include query volume trends, high-level categories of uses, sharing relationships enabled, how many users have access, and discipline/misuse outcomes in aggregate without compromising active investigations. This is particularly important given reporting that Milwaukee's system involves many users and that the city's surveillance ecosystem includes integration with hundreds of other cameras through programs that provide real-time access.

- **Oversight hearings built into normal governance routines.** The Public Safety and Health Committee's remit makes it a natural forum for recurring surveillance oversight hearings and for receiving transparency reports. The Fire and Police Commission retains disciplinary oversight and citizen complaint functions, but its capacity to drive policy change is structurally different after Act 12—making it important to formalize how policy recommendations move from investigation findings to enforceable rule changes.
- **Contract and vendor governance that matches real-world risk.** Milwaukee's legislative record shows that contract mechanics, including indemnification, can become central barriers or accelerants to deployment. The city should treat surveillance contracts as public-interest infrastructure agreements requiring clarity on retention and disclosure, clear rules on secondary use, and enforceable audit access for the city and designated independent reviewers.
- **Community-governance models such as CCOPS.** A 2025 coalition letter to the Common Council (2) argued that surveillance technology in Milwaukee has proliferated with insufficient transparency and community input and urged adoption of a Community Control Over Police Surveillance ordinance, emphasizing impacts on vulnerable communities and the need for democratic accountability. Any CCOPS-style structure in Milwaukee must be designed with the post-Act 12 legal reality in mind, but the underlying governance ideas, such as public approval, use policies, and regular reporting, directly target the structural weaknesses of LRPs that have been recently revealed by misuse incidents.

Surveillance technology without accountability is incompatible with democratic governance. Milwaukee residents deserve assurance that their movements are not subject to unchecked monitoring and that their data is not subject to misuse.

We urge the City to conduct an immediate policy review and implement robust oversight, training, and warrant-compliance standards for all current and future surveillance technologies.

Sincerely,



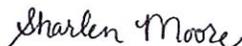
Marina Dimitrijevic
Alderswoman, 14th District



José G. Pérez
Alderman, 12th District



Alex Brower
Alderman, 3rd District



Charlen Moore
Alderswoman, 10th District

cc: Mr. Leon Todd

1. <https://wisconsinexaminer.com/2026/02/26/milwaukee-officer-accused-of-misusing-flock-surveillance-cameras/>
2. <https://www.aclu-wi.org/app/uploads/2025/05/ccopscoalitionletter.pdf>