May 21, 2025

Dear Members of the Milwaukee Common Council,

The undersigned community organizations are writing to express our **strong support for the implementation of a Community Control Over Police Surveillance (CCOPS) ordinance in our city**. The proliferation of surveillance technology by the Milwaukee Police Department has occurred with virtually no transparency, no opportunities for community input and – without a real opportunity to reject surveillance techs or advocate for critical guardrails – presents significant threats to civil rights and civil liberties that hurts us all but disproportionately impact communities of color, queer communities, people seeking reproductive healthcare, immigrant communities, people fleeing violence, and low-income communities.

While we trust our local elected officials in Milwaukee, in light of the current political climate and the uncertainty surrounding future administrations at both the federal and state levels (both in Wisconsin and in other states), **it is critical that our community has a say in if and how invasive surveillance technologies are used, how they are deployed against residents, if and how their data is stored and shared with third parties, and whether spending our limited tax dollars on surveillance technologies is the best way to promote public safety**.

What is CCOPS?

CCOPS is a gold-standard municipal model bill that has been passed in 26 cities, impacting more than 18 million people, in localities across the country from Madison, Wisconsin, to Detroit, Michigan, to St. Louis, Missouri, to ensure local communities are given a meaningful opportunity to review and participate in all decisions about if and how surveillance technologies are acquired and used locally. The guiding principles behind CCOPS can be found here. CCOPS is not a ban on police surveillance but is a mechanism to democratize the decision-making process surrounding Milwaukeeans' personal privacy and surveillance and to ensure transparency and accountability in programs funded or administered by local government through two avenues:

1. **It requires the release of extensive information to the public, a public hearing, and approval by the common council prior to funding, acquiring, or using new and existing surveillance technology.** This gives community members and elected officials the opportunity to discuss the risks and alleged benefits of these technologies, instead of law enforcement making these decisions unilaterally and in secret. This process includes answering uniform, critical questions related to each technology, including:
    a. How does the surveillance technology work?
    b. What is the proposed purpose(s) of the technology?
    c. What is the fiscal impact of the surveillance technology?
    d. What/whose information is being collected, and how is data stored?
    e. If the technology is not uniformly deployed/targeted throughout the city, what factors will be used to determine where the technology is targeted?
    f. What potential adverse impacts does the surveillance technology have on civil rights and liberties?
    g. What standards must be met by government entities when sharing surveillance data with third parties?

2. **It requires an annual report on each form of surveillance technology used in the city.** The publicly available report submitted to the Common Council would include information such as:
    a. A summary of how the surveillance technology was used
    b. Whether and how often collected surveillance data was shared with external parties
    c. A breakdown of how the surveillance technology was deployed geographically
    d. A summary of complaints or concerns received about the surveillance technology

Why Milwaukee Needs CCOPS

In recent years, we've seen states impose bans and criminal penalties for seeking **reproductive healthcare** and **gender-affirming care**; we've seen state and local law enforcement officials enforce **immigrant deportation schemes**; and we've seen surveillance used to **suppress free speech** and intimidate leaders of political movements. Law enforcement agencies, including U.S. Immigration Customs Enforcement (ICE), use mass location surveillance data collected on the local level to target individuals for investigation, even when doing so goes against local policies.

As such, policies are increasingly enacted, and local police departments and their surveillance mechanisms will likely be used to target individuals seeking or providing these services. This scenario is particularly alarming given that Black, Brown, Muslim, queer, low-income, and immigrant communities are already disproportionately affected by law enforcement practices.

Without robust oversight, we risk a resurgence of COINTELPRO-like tactics, where surveillance was used to suppress political dissent and target minority groups, including Dr. Martin Luther King, Jr. **At a minimum, people who live, work, visit, or attend school in Milwaukee deserve to know if and how they're being surveilled and who has access to that surveillance data**.

The CCOPS ordinance will require law enforcement agencies to seek approval from the Common Council before acquiring or using surveillance technology, even technologies already in use. This process will give the community a voice in decisions that directly impact their privacy and safety, fostering greater transparency and accountability, and that includes the ability to oppose the use of a surveillance technology entirely. A public hearing will allow community leaders to voice their approval, opposition, or concerns regarding these technologies. We believe that the Common Council and community leaders should have a seat at the table while making these decisions about the use of these technologies.

CCOPS also establishes guidelines for the use of approved technologies, which will help build trust between the police and the communities they serve. CCOPS isn't just about saying yes or no to surveillance technologies – it also would ensure that when they are used, the necessary guardrails are in place to ensure their use respects the civil rights and civil liberties of all impacted persons and communities.

We urge you to support the CCOPS ordinance and advocate for its adoption in our city. By doing so, we can protect our community from potential overreach and ensure that our policing practices are fair, transparent, and accountable to the people they are meant to protect. Most of all, we can ensure that Milwaukee joins the 26 other American cities in having the most transparent, democratic, and inclusive local surveillance law in the nation.

Thank you for your time and consideration.

Signed,

American Civil Liberties Union of Wisconsin
Black Leaders Organizing for Communities
Citizen Action of Wisconsin
Com Force MKE LLC
The Difference Principle
Ex-Incarcerated People Organizing
Fair Wisconsin
League of Women Voters Milwaukee County
Milwaukee Alliance Against Racist and Political Repression
Milwaukee Turners
NAACP Milwaukee Branch
National Lawyers Guild Milwaukee
Planned Parenthood Advocates of Wisconsin
Voces de la Frontera Action
WAVE Educational Fund
Wisconsin Council of Churches
Wisconsin Justice Initiative
Wisconsin Muslim Civic Alliance
Zao MKE Church