

[Your Full Name]

[[Your Street](#) Address]

[City, State, ZIP]

[Your Email Address]

[Your Phone Number]

[Date]

Gwinnett County Board of Commissioners

Attn: [Commissioner Name / "All
Commissioners"]

Gwinnett Justice and Administration Center

[75 Langley Drive](#)

Lawrenceville, GA 30046

Sent via email to:

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RE: Urgent Request to Suspend and

Independently Audit the Gwinnett County Police

Department's Flock Safety ALPR Program

Dear Chairwoman Hendrickson and Members of the Board of Commissioners,

I am a Gwinnett County resident writing to formally request that the Board (1) immediately suspend further expansion of the Gwinnett County Police Department's ("GCPD") Flock Safety automated license plate reader ("ALPR") program, (2) commission an independent, public audit of how this system has actually been used, and (3) adopt binding policy safeguards before any further funds are committed to this vendor. I am raising this now because of a rapidly growing body of evidence — from Georgia and across the country — showing that Flock Safety's audit and transparency systems, the very mechanisms this Board and GCPD have relied on to reassure the public that this surveillance network is accountable, have been deliberately weakened at the same time misuse

and abuse of these cameras is accelerating. Gwinnett County has invested heavily in this system. The County has approved a five-year, roughly \$[1.8](#) million contract with Flock Group Inc., expanding the network from four cameras at the 2020 launch to well over a thousand cameras today, with GCPD alone owning at least 199 of more than 1,100 Flock cameras operating in the county, and further expansion approved through 2029 (Gwinnett County news release; WSB-TV; Gwinnett County ALPR FAQ). Residents were told this network would be governed by transparent, auditable search logs. That premise is now in serious doubt.

Flock Safety Has Deliberately Gutted the Audit Logs That Were Supposed to Provide Accountability

In December 2025, Flock Safety unilaterally changed its Network Audit Logs so that they no longer include the officer's name, the specific

license plate searched, the vehicle "fingerprint," or the open-text reason for a search — replacing this information with the word "redacted." The company's own VP of Solutions stated this was done "to protect active investigations and ensure officer safety," but investigative reporting has shown this change followed public records requests that were successfully identifying individual officers' searches, and that Flock has told its own law enforcement customers it no longer trusts them with full information about who searched their own data (Footnote4a, "Flock Decides Cops Can't Be Trusted with Cop Data"). Reporting from Atlanta News First in July 2026 confirms this redaction policy is already in effect in Georgia, with Flock removing officer names from audit logs whenever an outside agency searches a department's data (Atlanta News First). Separately, police departments have been

explicitly instructed to be "as vague as permissible" when logging their reasons for searching Flock data, further degrading the usefulness of the one accountability tool the public has been told to rely on (Penn State Digital Shred, citing 404 Media reporting).

An audit log with the identity of the searcher blacked out is not an accountability tool. It is a liability shield.

Widespread, Confirmed Misuse by Georgia Law Enforcement

This is not a hypothetical or out-of-state concern. In the past several weeks alone: Five Albany, Georgia police officers were arrested and terminated after an internal audit found they misused Flock's retained license plate data for personal, non-law-enforcement purposes (USA Today; GlobeNewswire/Manila Times).

A Greene County sheriff's deputy was arrested

and terminated for accessing the Flock system for personal reasons over a three-month period, and two supervisor-level Cherokee County Sheriff's Office officers were separately arrested and terminated for similar non-investigative access (USA Today).

Atlanta News First Investigates has identified at least 20 documented cases across Georgia in the past year of officers disciplined, fired, or criminally charged for misusing the Flock system, including allegations of tracking romantic partners and acquaintances (Atlanta News First).

If misuse of this scale is surfacing even under Flock's newly weakened audit standards, the Board has no reasonable basis to assume Gwinnett County's own deployment is exempt from the same risk.

Use of Flock Data for Immigration Enforcement,
in Violation of Flock's Own Stated Policy

Flock Safety states publicly that it prohibits use of its data for civil immigration enforcement and that it has no contract with ICE (Flock Safety, "Does Flock Share Data With ICE?"). The evidence shows this prohibition is being routinely circumvented nationwide:

A Freedom of Information Act investigation by 404 Media found that ICE and Homeland Security Investigations have obtained "side-door" access to the Flock network by asking local and state law enforcement agencies to run searches on their behalf, despite having no formal contract with Flock — with more than 4,000 such lookups identified in a single analysis (Security Systems News; immpolicytracking.org).

The Electronic Frontier Foundation's June 2026 FOIA investigation found that Flock's own admin dashboard includes a drop-down menu allowing local police to subscribe their cameras to an

ICE-controlled "Immigration Violator" hotlist populated entirely from civil administrative warrants that no judge ever reviewed — with at least two agencies confirmed to have enabled it, one of them in direct contradiction of its own written policy banning immigration enforcement use (TFTC, summarizing EFF findings).

Dayton, Ohio found more than 7,100 immigration-related searches of its Flock data in explicit violation of its own policy, called them

"egregious violations," and resorted to physically covering their cameras with trash bags because their vendor contract made it too difficult to simply remove them (Fortune; Tech Times).

Denver's redacted audit logs confirmed over 1,400 searches conducted on behalf of ICE despite the city's public assurances that no data was being shared with the agency (ACLU of Colorado); Virginia counties logged roughly 4,000 similar searches (VPM News);

Washington state agencies were found to provide Border Patrol "front door," "back door," and "side door" access to Flock data (University of Washington Center for Human Rights); and by June 2026 at least 53 cities nationwide had cancelled their Flock contracts specifically over unauthorized federal data access (Tech Times). Flock's leadership has been explicit that it will not enforce its own stated policy: CEO Garrett Langley has said compliance is left entirely up to local agencies and that Flock does not remove agencies from its network or cancel contracts over immigration-enforcement policy violations (VPM News).

The Human Cost of Dragnet Surveillance and Aggressive Immigration Enforcement

This is not an abstract policy debate. In the past two weeks alone, ICE agents have fatally shot two people during operations in which federal officials themselves later admitted the person

killed was not their intended target: Lorenzo Salgado Araujo, a 35-year U.S. resident, was shot and killed during a Houston traffic stop, with Homeland Security later confirming to a member of Congress that he was not the person being sought (AP News; The Independent Florida Alligator); and days later, a 26-year-old named Joan Sebastian Guerrero was shot and killed in Biddeford, Maine, in a case Senator Angus King's office says also involved a mistaken target (The New York Times; CBS News). A dragnet surveillance network that federal immigration agents can access informally, without a contract, without a warrant, and without meaningful audit trail creates exactly the conditions in which these fatal, wrongful-target operations occur. Every additional Flock camera Gwinnett County installs is a potential input into that same apparatus.

Surveillance Without Evidence of Solving Crimes

Gwinnett County has justified this spending on the promise of solving and deterring crime. The Board should require GCPD to produce complete, current, independently verifiable statistics — not marketing figures supplied by Flock itself — on: the total number of ALPR searches conducted per year; the number of searches that led directly to an arrest, indictment, or conviction; and the number of searches for which no reason, or only a vague reason, was logged. Elsewhere, similar internal reviews have found only a small fraction of searches are ever meaningfully audited (in one jurisdiction, exactly 10 searches were audited whether the annual total was 1,637 or over 10,000, *The Morning Bun*), and EFF's national analysis of 12 million logged searches found patterns of misuse targeting protesters and ethnic minorities with no underlying criminal

predicate at all (EFF, 2025 year in review).

Gwinnett County residents deserve the same rigor applied to our own program before another dollar is spent expanding it.

Requested Actions

I respectfully request that the Board of Commissioners:

Immediately pause any further expansion of the GCPD Flock Safety camera network, including the additional cameras scheduled for installation through 2029, pending the outcomes below.

Direct GCPD to produce, and the County to publicly release, complete and unredacted Organization and Network Audit Logs for the past 24 months (redacting only what is strictly required by O.C.G.A. § 35-1-22 and the Georgia Open Records Act), including officer identity, search justification, and any instance in which data was accessed by or shared with any

federal immigration enforcement agency.

Commission an independent, third-party audit — not one conducted by Flock Safety itself or relying solely on Flock's self-reported "Audit Assistance" tool — to determine how many searches of Gwinnett's Flock data have been conducted on behalf of, or shared with, ICE, Homeland Security Investigations, Customs and Border Protection, or any entity whose primary purpose is civil immigration enforcement.

Adopt a binding written policy, enforceable by contract and by County ordinance, that explicitly and permanently prohibits GCPD from sharing Flock data with, or running searches on behalf of, any federal immigration enforcement agency, and that requires immediate public disclosure of any violation.

Confirm that GCPD's Flock system has not enabled any NCIC "Immigration Violator" hotlist or comparable federal watchlist feature, and if it

has, disable it immediately.

Require full, unredacted officer-level audit reporting as a non-negotiable term of any renewed or renegotiated Flock Safety contract, and instruct the County Attorney to evaluate whether Flock's revised terms and conditions — including new limits on data ownership and new arbitration requirements — are still in the County's interest (ACLU).

Hold a public hearing, with advance public notice, dedicated specifically to this issue before any further funds are appropriated for this program.

Gwinnett County taxpayers have already committed well over two million dollars to this system. We are entitled to know who is looking at our data, why, and whether it is being used against our own neighbors in ways this Board never authorized. I ask that this letter be entered into the public record and that I receive

a written response addressing each of the requests above.

Thank you for your time and your service to this county. I look forward to your response.

Respectfully,

[Your Full Name]

[Your Address]

[Your Phone Number / Email]

Note: This is a template. Before sending, personalize the bracketed fields, confirm current commissioner names/emails at <https://www.gwinnettcounty.com/government/departments/elections/elected-officials/board-of-commissioners>, and consider submitting during the public comment period of a Board meeting (first and third Tuesdays, [2:00 p.m.](#), Gwinnett Justice and Administration Center) in addition to mailing/emailing this letter.