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To: Ruger, Stephen - CM <sruger@c3gov.com>

Subject: Written Comment for upcoming meeting regarding Flock Cameras

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Good afternoon!

My name is Jenna Moran - I live in Commerce City and have never submitted a public comment before. I hope that this is the correct place to do so! Please see below for comments that I would appreciate the City Council considering before voting on the Flock Camera issue.

Thank you!!

Public Comment Regarding Proposed Flock Camera Contract

Mayor and Members of City Council,

My name is Jenna Moran, and I am a resident of **Commerce City**. I appreciate the Council's commitment to public safety, but I am writing to express serious concerns regarding the proposed contract with **Flock Safety** and to urge caution before approving a citywide license-plate-reader surveillance system.

First, cost and long-term financial impact.

Flock contracts involve not only initial installation costs but ongoing annual subscription fees, expansion expenses, and administrative overhead. Across Colorado and the Front Range, communities have learned that once installed, these systems are difficult to scale back without sunk-cost pressure to continue funding them indefinitely. At a time when residents are facing rising housing, utility, and tax burdens, it is reasonable to ask whether this is the best use of public funds—and whether the City has independently verified that the technology delivers measurable crime reduction proportional to its cost.

Second, privacy and civil liberties concerns.

Flock cameras do not simply target suspects; they collect and store location data on every resident, worker, and visitor who drives through Commerce City. Over time, this creates a searchable database of people's movements—where they live, work, worship, or seek medical care—without a warrant or individualized suspicion. This level of passive, mass

data collection represents a fundamental shift from traditional policing to continuous surveillance, and many residents have not been given a meaningful opportunity to consent or opt out.

Third, data access, retention, and secondary use.

Even when a city asserts that it “controls its data,” Flock’s platform is designed for sharing across agencies and jurisdictions. Civil rights organizations, including the **ACLU of Colorado**, have raised concerns statewide about ALPR data being accessed beyond its original purpose. Commerce City residents deserve clear, binding guarantees—codified in ordinance, not policy—that restrict who can access this data, for what purpose, for how long, and with what auditing and enforcement mechanisms.

Fourth, public opinion and transparency.

Across Colorado and nationally, public opinion on Flock cameras has shifted as residents learn more about how these systems work. Initial support often gives way to opposition once privacy risks and data-sharing realities become clear. In multiple cities, backlash has resulted in paused programs, terminated contracts, or litigation over public records and transparency. Proceeding without robust community engagement risks undermining public trust in City Council and law enforcement alike.

Finally, legal and litigation risk.

ACLU affiliates in Colorado and other states are actively scrutinizing Flock deployments, and some are fundraising and preparing for potential legal challenges related to public records access, privacy rights, and improper data sharing. If Commerce City moves forward without ironclad safeguards, the City may expose itself to costly litigation, public records disputes, and reputational harm—costs that ultimately fall on taxpayers.

In closing, I urge the Council to pause before approving this contract and to consider alternatives, including:

- Requiring a public vote or extended community hearings
- Passing a surveillance oversight ordinance before any contract is signed
- Limiting camera use to narrowly defined, time-bound pilot programs
- Requiring warrants for searches unrelated to specific, serious crimes
- Prohibiting data sharing with other agencies
- Establishing strict retention limits and independent audits

Public safety and civil liberties are not mutually exclusive—but once mass surveillance infrastructure is installed, it is extremely difficult to undo. I respectfully ask the Council to place transparency, privacy, and fiscal responsibility at the center of this decision.

Thank you for your time and consideration.