

Automated License Plate Readers (ALPR) on Sanibel Island

An Analysis of Flock Safety, Axon Enterprise, Legal Liabilities, and Public Opinion

Executive Summary

The deployment of Automated License Plate Readers (ALPR) across the United States has fundamentally altered modern policing and traffic management. On Sanibel Island, the local police department has adopted Flock Safety's ALPR technology, primarily to navigate traffic congestion and aid in post-hurricane recovery efforts. However, the proliferation of this technology, led by Flock Safety and its chief competitor Axon Enterprise, has ignited a nationwide debate. This report provides a comprehensive, fact-based analysis of the technology, weighing its operational benefits against substantial legal liabilities, privacy concerns, and shifting public opinion.

1. Technology Overview

1.1 Flock Safety

Flock Safety, founded in 2017 and headquartered in Atlanta, Georgia, operates a network of ALPR cameras that captures an estimated 20 billion vehicle scans per month across the United States [1]. As of 2025, the company operates in over 6,000 communities across 49 states, employs approximately 1,500 people, and is valued at \$7.5 billion [1]. The company's flagship products, the Falcon and Sparrow cameras, are solar-powered, cellular-connected devices designed to capture images of vehicles traveling at speeds up to 100 mph at distances of up to 75 feet [1].

Flock's system relies on "vehicle fingerprint technology," an artificial intelligence algorithm that identifies not only the license plate but also the vehicle's make, model, color, and distinguishing features such as bumper stickers, dents, or roof racks [2]. The data is stored in a centralized, cloud-based network, allowing law enforcement agencies to search for vehicles across jurisdictions [3]. By default, Flock retains data for 30 days, though local agencies can adjust this timeframe [2].

On Sanibel Island, the police department utilizes Flock Safety's Traffic Analytics platform. Following the destruction of the island's legacy LPR system during Hurricane Ian in 2022, Sanibel adopted Flock cameras to monitor daily vehicle counts, hourly traffic volumes, and vehicle classifications. This data is used to proactively deploy traffic aids at the island's four-way stops, mitigating congestion caused by seasonal tourism and heavy construction vehicles [4].

1.2 Axon Enterprise (Competitor)

Axon Enterprise, widely known for its Tasers and body-worn cameras, is a major competitor in the ALPR market. While Flock focuses primarily on fixed surveillance cameras, Axon integrates ALPR technology into a broader "public safety ecosystem." Axon's Fleet 3 system incorporates ALPR into police dashcams, while its newer products, Axon Outpost and Axon Lightpost, are fixed cameras that combine license plate reading with live video streaming [5].

Axon's systems feed into "Fusus," a real-time operations platform that aggregates data from body cameras, drones, CCTV, and ALPRs into a single interface [5]. This integration provides law enforcement with a highly comprehensive surveillance apparatus. While some municipalities have switched from Flock to Axon due to controversies surrounding Flock, privacy advocates note that Axon's interconnected ecosystem consolidates multiple streams of surveillance data into a single platform, which may pose a greater risk to digital privacy [6]. Additionally, Axon's own AI Ethics Board has acknowledged that ALPRs are "severely under-regulated" and that their unregulated use poses "serious concerns," including the potential to exacerbate enforcement of low-level offenses and disproportionately affect low-income communities and communities of color [16].

2. Audio Surveillance Capabilities

Beyond license plate recognition, Flock Safety has expanded into audio surveillance through its Raven product line, launched in 2021. The Raven is an audio gunfire locator, similar in function to the ShotSpotter system used in many major cities [1]. The device records audio in five-second increments and uses artificial intelligence to analyze the sound clips for audible gunfire. When a gunshot is detected, the device estimates its location and alerts police [1]. Like the ALPR cameras, Raven devices can be mounted on manufacturer-supplied poles and powered by solar panels.

Flock claims the Raven system has detected at least 1,200 gunshots, with false positive and false negative rates below 1% [1]. However, in October 2025, Flock announced that Raven devices would begin listening for "human distress," with advertisements depicting police being alerted when the device detects screaming [1]. This expansion from gunshot detection to ambient audio monitoring of human vocalizations represents a significant broadening of the system's surveillance scope.

The implications of audio monitoring are distinct from visual surveillance. While Flock's ALPR cameras capture images on public roadways, audio detection systems that listen for "human distress" could potentially record conversations, arguments, or other sounds in residential areas. The legal framework governing such ambient audio capture remains underdeveloped in most jurisdictions, including Florida.

3. People Tracking and Identification Capabilities

3.1 Condor Pan-Tilt-Zoom Cameras

Flock Safety markets its ALPR cameras as systems that "focus on vehicles, not people" [2]. However, the company's product line extends beyond license plate readers. Flock's Condor cameras are pan-tilt-zoom (PTZ) devices that track moving objects in a scene, including people [1]. According to Flock's own marketing materials, the Condor cameras can automatically zoom in on cars, people, faces, phone screens, and other nearby objects [1]. The cameras can also be controlled manually by operators [1].

As of mid-2026, Flock operates approximately 120,000 cameras nationwide, a figure that includes both ALPR units and PTZ cameras [8]. The Condor line represents a qualitative shift from license plate reading to broader visual surveillance, as these cameras are capable of capturing detailed images of individuals rather than only vehicles.

3.2 FreeForm Natural Language Search

Flock provides a tool called "FreeForm" that allows law enforcement officers to search for anything visible in a scene using natural language queries [1]. Public records requests have revealed that police officers have used FreeForm to search for individuals based on characteristics including race, gender, clothing, height, tattoos, and perceived political affiliation [1].

This capability transforms the system from a vehicle identification tool into a people-tracking system. An officer can, for example, search for "white male wearing red hat" or "person with arm tattoo" across the entire Flock network. The searches are logged, but audits have shown that officers frequently enter vague justifications such as "investigation" or even nonsensical entries like "hehehe" when required to provide a reason for a search [15].

3.3 Nova Person Lookup Tool

In May 2025, reporting revealed that Flock was developing a product called "Nova," described internally as a "public safety data platform." Nova was designed to supplement ALPR data with

information from data breaches, public records, and commercially available data in order to track specific individuals without a warrant [1]. As of May 2025, Nova was already in use by law enforcement in an early access program. The Electronic Frontier Foundation described Flock Nova as a "dystopian panopticon" [1]. Following media reporting by 404 Media, the company decided not to include information from data breaches in Nova, though the product continues to draw from public records and commercial data [1].

4. How AI Capabilities Amplify Privacy Concerns

Artificial intelligence is the foundational technology that enables ALPR networks to function at scale. Without AI, a license plate camera would simply produce an image. With AI, that image becomes a searchable data point in a network of billions of records. Several specific AI capabilities raise privacy questions that extend well beyond traditional camera surveillance.

4.1 Pattern-of-Life Analysis

AI algorithms can aggregate individual vehicle sightings across time and geography to construct detailed "patterns of life." By analyzing where a vehicle appears repeatedly, the system can infer where a person lives, works, worships, seeks medical care, attends political events, or visits socially [9]. Flock's system does produce what the company has acknowledged is a "heat map" showing where "point-in-time images have been captured of a vehicle" for up to an entire month [15]. This capability was the subject of a notable incident in Oshkosh, Wisconsin, where Flock's chief information security officer told the city council the system did not create such maps, only for the city to discover the following day that it did [15].

4.2 Vehicle Identification Without a License Plate

Flock's AI can identify vehicles even when the license plate is obscured, missing, or unreadable. The system uses machine learning to match vehicles based on visual characteristics alone, including make, model, color, damage, and aftermarket modifications [8]. This means that removing or covering a license plate does not prevent the system from tracking a vehicle across the network.

4.3 Cross-Jurisdictional Network Effects

The AI-powered network allows any participating law enforcement agency to query data collected by any other participating agency. Approximately 75% of Flock's law enforcement customers opt into the company's national lookup service [6]. This means that a search initiated by a single officer in one jurisdiction can return results from cameras in thousands of other communities across the country. The scale of this network, processing billions of data points monthly, creates a surveillance apparatus that no single agency could build on its own.

4.4 Real-Time Alerting and Predictive Capabilities

AI enables real-time alerts when a vehicle on a "hotlist" passes any camera in the network. This allows law enforcement to respond within minutes to sightings of vehicles associated with crimes, missing persons, or warrants. However, the same real-time capability has been used by individual officers to track the movements of romantic partners, colleagues, and other individuals for personal reasons [8]. The system's speed and accessibility make misuse difficult to prevent through policy alone.

4.5 Axon Vision and Activity Recognition

Axon's AI platform, called "Axon Vision," can recognize observable activity in real time, including physical altercations, unauthorized access, medical emergencies, and hazardous conditions [6]. When combined with Axon's body cameras, drones, and ground robots, this creates a system capable of identifying and responding to human behavior, not merely recording it. The integration of AI-powered activity recognition with ALPR data means that a single platform can simultaneously track vehicles, identify individuals, and interpret their actions.

5. Inter-Agency Data Sharing in Southwest Florida

The mechanics of how ALPR data is shared between jurisdictions is a central point of contention in the privacy debate. Flock Safety's system architecture inherently encourages maximum data sharing, creating a web of interconnected surveillance networks across Southwest Florida and beyond.

5.1 The Lee County ALPR Network

In Lee County, the surveillance network is highly integrated. The Cape Coral Police Department, Sanibel Police Department, and the Lee County Sheriff's Office all utilize Flock Safety cameras or access data generated by them [22]. While the Lee County Sheriff's Office maintains that it does not own or operate the cameras directly, it actively accesses the data collected by municipal police departments and private entities (such as homeowner associations and businesses) for investigative purposes [7].

According to a recent investigation by WINK News, agencies using Flock can choose to share their data on a 1:1 basis with nearby agencies, within a specific geographic radius, or opt into statewide or national lookup networks [23]. This means that data captured by a camera on Sanibel Island is not isolated to the Sanibel Police Department; it is routinely accessed by deputies from the Lee County Sheriff's Office and potentially by officers in Cape Coral, Fort Myers, and neighboring Charlotte County [23].

5.2 Mechanics of Flock Network Sharing

Flock's data sharing model operates on a reciprocal basis. If a police department chooses to share its data with the entire nationwide network, that department is granted the ability to search the entire nationwide network [24]. This "you show me yours, I'll show you mine" incentive structure encourages local departments to upload their residents' location data into a national database.

To enable this, system administrators simply select an "Enable National Lookup" option within the Flock interface [24]. Once enabled, officers from thousands of out-of-state agencies can track the movements of vehicles in Southwest Florida.

5.3 Inter-Agency Privacy Implications

The integration of Sanibel's ALPR data into regional and national networks creates significant privacy implications:

- **"Side Door" Access by Federal Agencies:** Even if a local agency like Sanibel Police chooses not to share data directly with federal immigration authorities, the interconnected nature of the network creates vulnerabilities. Research by the ACLU and the University of Washington Center for Human Rights has documented numerous instances of "side door" searches, where local police officers conduct searches on behalf of Immigration and Customs Enforcement (ICE) or Customs and Border Protection (CBP) [24] [25].
- **"Back Door" Vulnerabilities:** Audits of Flock networks in Washington State revealed that U.S. Border Patrol agents were able to conduct thousands of searches on local ALPR networks that had *not* explicitly authorized sharing with federal agencies [25]. Flock attributed this to a "pilot program" and poor communication, but privacy advocates argue it demonstrates that technical safeguards can be easily bypassed [25].
- **Evasion of State Privacy Laws:** When local data is uploaded to a national network, it becomes accessible to law enforcement in states with vastly different legal frameworks. For example, ALPR data collected in states where abortion or gender-affirming care is legal has been accessed by law enforcement in states where those activities are criminalized, effectively circumventing local privacy protections [24].
- **Audit Deficiencies:** Flock relies on officers entering a "reason" for their search to prevent misuse. However, network audits frequently show officers entering vague terms like "investigation," "suspicious," or even nonsensical strings of characters, rendering the audit logs virtually useless for oversight purposes [24].

6. Operational Pros and Cons

Category	Advantages	Disadvantages
Crime Investigation	ALPRs generate actionable leads for stolen vehicles, missing persons, and violent crimes. Flock states it supported approximately 1 million law enforcement investigations in 2025 and helped locate more than 10,000 missing persons [8].	Studies have shown error rates up to 10% in plate reading [1]. One California police department reported that 71% of stolen or felony vehicle alerts from Flock were incorrect [1].
Traffic Management	On Sanibel Island, ALPR data provides real-time analytics on vehicle volume and classification, enabling proactive traffic control without the need for traffic lights [4].	The constant surveillance of all passing vehicles, regardless of criminal suspicion, creates a dragnet effect that captures data on the entire population [9].
Data Sharing	Cloud-based networks allow local police to instantly share "hotlists" and coordinate with neighboring jurisdictions, enabling faster response to cross-border crimes [3].	Unrestricted data sharing has led to local data being accessed by federal immigration authorities and out-of-state agencies, often without the knowledge or consent of local officials [3] [10].
Deterrence	Some law enforcement agencies report a deterrent effect on crime in areas where cameras are deployed [1].	Independent verification of deterrence claims has been limited. A Forbes investigation questioned Flock's claim of an 80% reduction in burglaries in San Marino, California, finding that burglaries actually slightly increased during the cited period [1].

Category	Advantages	Disadvantages
Cost	Flock cameras are leased rather than purchased, reducing upfront capital expenditure for municipalities. Solar power and cellular connectivity eliminate the need for wired infrastructure [1].	Ongoing subscription costs create long-term financial commitments. Syracuse, New York, signed a five-year, \$422,636 contract with Axon after leaving Flock [17].

6. Legal Liabilities

6.1 Fourth Amendment Challenges

The continuous, indiscriminate recording of vehicle movements raises questions about whether ALPR networks constitute a "search" under the Fourth Amendment. By tracking a vehicle over time, ALPR networks can reveal intimate details about a person's life, including their medical providers, religious affiliations, and political activities [9].

In June 2024, a Circuit Court judge in Norfolk, Virginia, ruled that the collection of location data from the city's 172 Flock cameras constituted a search under the Fourth Amendment. The court determined that such data cannot be used as evidence in a criminal case if collected without a warrant, likening the ALPR network to placing a GPS tracking device on every vehicle [1]. In February 2026, a federal judge ruled that Norfolk's cameras did not violate people's rights "yet," but noted that the constitutional question remains open as the technology evolves [18].

In April 2026, the ACLU filed an amicus brief in a Fourth Circuit case arguing that the use of ALPR systems gave the government unprecedented powers of surveillance [19]. The Institute for Justice has also filed federal lawsuits challenging ALPR use in San Jose, California, on Fourth Amendment grounds [20].

6.2 Wrongful Arrests and False Positives

Flock Safety's technology has been implicated in multiple wrongful detentions. In one high-profile incident in 2026, an automotive journalist test-driving a manufacturer-owned Range Rover was swarmed by police and detained after a Flock camera misread his dealer license plate, matching it to an incomplete entry for a stolen vehicle in California [8]. A police department in Roseville, California, reported that 71% of the 1,427 stolen or felony vehicle alerts generated by their Flock system in 2023 and 2024 were incorrectly identified plates [1]. These

false positives expose municipalities to potential liability for civil rights violations and false imprisonment claims.

6.3 Police Misuse

There have been at least two dozen cases in which officers resigned or were arrested for allegedly abusing Flock's system to stalk romantic interests, according to a tally from the Institute for Justice [8]. In Milwaukee, one officer used Flock to track a romantic partner 124 times and that partner's ex 55 times [8]. In July 2026, five Albany, Georgia, police officers were arrested and fired for misusing Flock, and two officers in Greer, South Carolina, were fired for similar conduct [8]. These incidents expose municipalities to liability for the actions of their officers and raise questions about whether adequate safeguards exist.

6.4 California Class Action Lawsuit

Flock Safety faces a class-action lawsuit in California filed by Gibbs Law Group. The lawsuit alleges that Flock violated state privacy laws by enabling local police departments to share ALPR data with out-of-state law enforcement and federal agencies, including ICE and CBP [10]. The suit claims that federal agencies accessed data from the San Francisco Police Department's cameras more than 1.6 million times, and that Los Altos's readers shared information to out-of-state agencies more than a million times [10]. Under California law, individuals harmed by unauthorized access to ALPR information can sue for a minimum of \$2,500 per violation, plus punitive damages [10].

6.5 Cybersecurity Vulnerabilities

In 2025, a series of cybersecurity vulnerabilities were identified in Flock cameras, including hardcoded credentials, cleartext storage of code, and an enabled debug interface [1]. Flock stated these vulnerabilities would require physical access to the device to exploit. Later in 2025, a separate flaw was found that allowed anyone to access live camera feeds and other data from the Flock Condor line through publicly exposed live streams and administrator control panels [1]. Flock stated the issue involved a limited number of devices caused by a misconfiguration.

6.6 Florida Legal Framework

In Florida, the use of ALPRs is governed by Statutes §§ 316.0777 and 316.0778. The law permits the use of ALPRs for collecting active criminal intelligence but strictly prohibits their use for issuing traffic citations [11]. Data captured by these systems is deemed confidential and exempt from public records requests under Florida law, intended to protect the personal identifying information of drivers [11]. The Florida Department of Law Enforcement (FDLE) issued revised ALPR guidelines in November 2024 [21].

However, this statutory confidentiality has fueled local transparency concerns. The Sanibel Police Department denied an open records request regarding their use of Flock Safety cameras,

citing state exemptions [12]. This lack of transparency prevents residents from knowing exactly how their data is being used, how long it is retained, and with whom it is shared.

6.7 Data Retention: Sanibel vs. Lee County vs. State Law

Data retention is one of the most consequential policy decisions governing ALPR use. The longer data is retained, the more detailed a picture of a person's movements and habits can be constructed. Multiple overlapping frameworks govern how long ALPR data may be stored in Southwest Florida, and no publicly available evidence indicates that Sanibel has adopted a local ordinance or city council resolution establishing retention limits beyond the state defaults.

Florida State Framework:

Florida Statute § 316.0778 directs the Department of State, in consultation with the Florida Department of Law Enforcement (FDLE), to establish a maximum retention schedule for ALPR data [11]. The FDLE's Criminal and Juvenile Justice Information Systems (CJJIS) Council issued revised guidelines in November 2024 that establish a tiered retention structure [26]:

Retention Tier	Duration	Applicable Use
Tactical access	30 days	Day-to-day operational use by officers
Investigative/Intelligence retention	Up to 3 anniversary years	Data linked to ongoing or continuing criminal investigations
Active investigation hold	Beyond 3 years	Only if data is the subject of an active criminal matter

The FDLE guidelines state that "data captured, stored, generated, or otherwise produced shall be accessible in the ALPR system for 30 days for tactical use," while data gathered "without specific suspicion may be retained for no longer than 3 anniversary years" [26]. This means that under Florida's state framework, ALPR data on innocent motorists who are not the subject of any investigation can legally be stored for up to three years.

Flock Safety's Default Policy:

Flock Safety's standard retention period is 30 calendar days from the date of capture, after which data is permanently deleted from the cloud [27]. However, Flock's evidence policy explicitly states that if a customer wishes to impose a longer retention period, Flock will offer extended retention for up to one year, provided the agency first obtains approval from an

elected official or governing body [27]. This means that any agency in Lee County could extend retention beyond 30 days with a simple vote or executive approval.

Sanibel's Position:

No publicly available local ordinance, city council resolution, or police department policy specific to Sanibel Island establishes data retention limits that differ from the state default or Flock's standard 30-day period. The Sanibel Police Department's refusal to fulfill an open records request regarding its Flock cameras [12] makes it impossible for residents to independently verify what retention period is in effect, whether data has been extended beyond 30 days for investigative purposes, or whether the department has opted into the full three-year state maximum.

Lee County Sheriff's Office:

The Lee County Sheriff's Office has stated that it does not own or maintain Flock cameras but accesses data collected by other agencies and private entities [22]. The Sheriff's Office has not publicly disclosed a specific data retention policy for the ALPR data it accesses. Because the Sheriff's Office accesses data from multiple sources (municipal police departments, private communities, and businesses), the retention period for any given data point depends on the policies of the entity that owns the camera, creating a patchwork of retention standards across the county.

Cape Coral and Charlotte County:

Neither the Cape Coral Police Department nor the Charlotte County Sheriff's Office has published a standalone ALPR data retention ordinance. Charlotte County Sheriff Bill Prummell stated that "usage of [ALPR systems] is extremely limited and tracked internally" but did not specify retention periods [23]. Cape Coral Police did not respond to media inquiries about their data retention practices [22].

Comparative Context:

The absence of local ordinances in Lee County stands in contrast to jurisdictions that have adopted stricter limits. Flagstaff, Arizona, reduced its retention period to 14 days before ultimately canceling its Flock contract [3]. New Hampshire state law requires non-hit data to be deleted within three minutes [9]. The proposed Massachusetts legislation (H.3755) would require deletion within 14 days unless data is tied to a specific, ongoing criminal investigation [24].

The practical consequence for Sanibel residents is that, absent a local ordinance, the default state framework permits data to be retained for up to three years, and there is no publicly

available mechanism for residents to verify what retention period their police department has selected or whether data has been placed on investigative hold.

7. Public Opinion and Political Response

7.1 Bipartisan Opposition

Opposition to Flock and Axon cameras is a rare issue that bridges the political divide. Progressive advocates oppose the technology due to its potential for abuse by law enforcement, racial profiling, and its use in tracking individuals seeking reproductive healthcare or facing immigration enforcement [3] [13]. Conservative and libertarian groups oppose the cameras as an example of government overreach and a violation of constitutional liberties [13] [14].

CNN reported in July 2026 that "in a politically divided country, opposition to Flock cameras is the rare issue that binds people across the ideological spectrum" [13]. The article quoted individuals from across the political spectrum:

"It's a violation of people's privacy," said Caleb Williams, a 24-year-old in rural South Carolina who identified as a political independent.

"Rational people know it comes down to violating personal liberties," said Adrien Kaiser, a self-described constitutional conservative who lives northwest of Houston.

"I firmly believe the government can do things to make life better for people, but a surveillance state is the first step towards a police state," said Jon Dendy, a progressive in Massachusetts.

7.2 Federal Legislative Efforts

At the federal level, Republican Representatives Tim Burchett (TN) and Thomas Massie (KY) have introduced legislation to prohibit federal agencies from purchasing, operating, or accessing automated surveillance technologies, including license plate readers [14]. The legislation would also prevent state and local governments from using federal funding to purchase similar systems [14]. Republican Representative Scott Perry (PA) worked with Democratic Representative Jesus "Chuy" Garcia on a bipartisan amendment that would have restricted ALPR use to toll collection purposes only [14].

7.3 Community Actions

As of early 2026, at least 30 localities had either deactivated their Flock cameras or canceled their contracts since the beginning of 2025, with much of the activity occurring in the preceding

three months [3]. These include Flagstaff, Arizona; Cambridge, Massachusetts; Eugene, Oregon; Santa Cruz, California; Fort Collins, Colorado; Madison, Wisconsin; Knoxville, Tennessee; Syracuse, New York; and Walla Walla, Washington [3] [13].

In Lee County, Florida, where Sanibel is located, residents have raised privacy concerns about Flock cameras. Gulf Coast News reported in February 2026 that residents described the cameras as "an invasion of privacy" and expressed concern about the collection of personal information [7]. The Lee County Sheriff's Office confirmed it has access to Flock cameras "solely for public safety purposes" but does not own or maintain the cameras [22].

7.4 Flock Safety's Response

Flock Safety maintains that its technology is an essential crime-fighting tool and that new law enforcement partnerships significantly outpace cancellations [3]. The company has introduced audit tools, keyword filters, and dropdown menus requiring officers to select an "offense type" before conducting searches [3]. CEO Garrett Langley has stated: "We can have safety and privacy. Let's do both. Let's give communities the controls and safeguards to select safety and privacy" [8].

However, the ACLU has documented instances in which Flock representatives made inaccurate statements to city councils regarding the system's capabilities, including a case in Oshkosh, Wisconsin, where the city council rescinded its Flock contract one day after approval upon discovering that the company's chief information security officer had provided false information about the system's tracking features [15].

8. Conclusion

The ALPR technology deployed on Sanibel Island offers measurable benefits for traffic management and criminal investigation. At the same time, the technology carries documented risks, including false positives that have led to wrongful detentions, police misuse for personal surveillance, unauthorized data sharing with federal agencies, and expanding AI capabilities that enable the tracking of individuals rather than only vehicles. The audio surveillance features of Flock's Raven system and the people-tracking capabilities of the Condor cameras and FreeForm search tool extend the system's reach well beyond license plate reading.

Public opinion has shifted significantly against ALPR technology in 2025 and 2026, with opposition emerging from both progressive and conservative constituencies. Multiple municipalities have canceled contracts, federal legislation has been introduced to restrict the technology, and courts continue to evaluate whether warrantless ALPR data collection violates the Fourth Amendment. Any community considering the continued use of this technology would

benefit from establishing clear, publicly debated policies governing data retention, data sharing, permissible use cases, and independent auditing.

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