



Memorandum

TO: Kevin J. Jackson, Village Manager

A handwritten signature in blue ink, appearing to be "KJ", enclosed in a circle.

FROM: Shatonya Johnson, Chief of Police

A handwritten signature in blue ink, appearing to be "SJ".

FOR: Village President and Board of Trustees

DATE: June 27, 2025

SUBJECT: Usage of Automatic License Plate Readers (ALPR) in the Village of Oak Park

Purpose

The purpose of this memorandum is to respond to concerns about potential violations of Illinois State law involving the use of Flock Safety Technology in Danville and Mount Prospect, Illinois. The memorandum also provides information on how the Oak Park Police Department proactively safeguards ALPR data in compliance with State and local requirements.

Background

On May 30, 2025, several media outlets reported that, following a Freedom of Information Act (FOIA) request for records from the Danville Police Department (Illinois), more than 4,000 nationwide Flock ALPR immigration searches were conducted between June 2024 and May 2025. These searches, initiated by police departments across various states including Texas, Arizona, Florida, and Missouri were noted to be for purposes related to "ICE," "ICE/ERO," "ICE WARRANT," and immigration enforcement.

On June 11, 2025, the Mount Prospect Police Department (Illinois) was identified as having violated Illinois statute by assisting the Johnson County Sheriff's Department (Texas) in locating a missing person who had reportedly self-administered an abortion. Mount Prospect's ALPR system also logged 262 immigration-related searches in 2025 using the nationwide search function.

Concerns

If confirmed, these actions would violate Illinois statute, including [625 ILCS 5/2-130](#), which prohibits an ALPR user from selling, sharing, transferring, or allowing access to Flock data if it is to be used:

1. To investigate or enforce laws that interfere with a person's right to obtain lawful reproductive health care services, or
2. For the detention or investigation of individuals based on immigration status.

Additionally, the immigration concerns are contradictory to the Village's Welcoming Ordinance and Reproductive Health Care Ordinance.

These incidents raise serious concerns about data security, transparency, and trust in ALPR providers and law enforcement, particularly regarding the use of nationwide Flock search functionality to support immigration enforcement and reproductive health investigations. The ability of external agencies, such as ICE, to access Illinois Flock data has created vulnerabilities and potential liabilities.

Flock Agreement

The Village Board approved the Flock Agreement in 2022 and renewed it in 2024. The Law Department advised that the Agreement includes the following terms:

Flock is only required to delete "Footage" after 30 days," per Sec. 4.2. However, Flock may keep the deleted Footage per Sec. 4.1, and "Footage" is only one component of "Agency Data," which Flock has no duty to delete and has a perpetual license to use. Per Sec. 1.1, "Agency Data" means the "data, media and content provided by Agency through the Services. For the avoidance of doubt, the Agency Data will include the Footage."

Sharing by Flock. Pursuant to Sec. 4.1 of the Agreement, Flock may share footage from Village cameras with other law enforcement agencies, government officials, and third parties "if legally required to do so or if Flock has a good faith belief that such access, use, preservation or disclosure is reasonably necessary to: (a) comply with a legal process or request; (b) enforce this Agreement, including investigation of any potential violation there; (c) detect, prevent or otherwise address security, fraud or technical issues; or (d) protect the rights, property or safety of Flock, its users, a third party, or the public as required or permitted by law, including responding to an emergency situation."

Additional Sharing by Flock. Pursuant to Sec. 4.1, the Village granted Flock "a non-exclusive, worldwide, perpetual, royalty-free right and license (during and after the term hereof) to disclose the Agency Data (including any footage) to enable law enforcement monitoring against law enforcement hotlists as well as provide Footage search access to law enforcement for investigative purposes only. Flock may store deleted Footage in order to comply with certain legal obligations but such retained Footage will not be retrievable without a valid court order."

Deletion of Footage. Pursuant to Sec. 4.2, "Flock will automatically delete Footage older than thirty (30) days. Agency has a thirty (30) day window to view, save and/or transmit Footage to the relevant government agency prior to its deletion."

Aggregated Data Sharing by Flock. Pursuant to Sec. 4.2, the Village granted Flock a "non-exclusive, perpetual, irrevocable, worldwide, royalty-free, fully paid license to use, reproduce, modify and distribute the Agency Data as a part of the Aggregated Data." Pursuant to Sec. 4.4, "Aggregated Data is compiled anonymous data which has been stripped of any personal identifying information." Per that Section, Flock has the right to "collect and analyze data that does not refer to or identify Agency or any individuals or de-identifies such data and other information relating to the provision, use and performance of various aspects of the Services and related systems and technologies."

Safeguards

The data exposures mentioned above do not apply to the Oak Park Police Department due to proactive measures that were already in place and newly implemented safeguards.

Policy Restriction: As of June 4, 2024, the Village Board directed the Police Department to restrict ALPR access strictly to Illinois agencies. Any out-of-state agency must obtain approval from the Chief of Police for an Oak Park Police Department officer to search.

Auditing and Oversight: The Police Department provides data regarding all stops and any approved felony related searches to the Citizens' Police Oversight Committee (CPOC) in a monthly audit. In addition to the Department usage, CPOC is provided with the name and number of searches conducted by outside agencies, as outlined in [General Order 4.68, Section VII, F](#). These reports are reviewed by CPOC to ensure transparency and compliance. To date, CPOC has not identified any usage concerns related to immigration or reproductive health investigations. In reviewing these reports, CPOC has not identified any misuse of this technology by staff.

Access Revocation: The Danville and Mount Prospect Police Departments have had their access to Oak Park's ALPR system revoked following these incidents.

Suspended Sharing: Illinois agencies no longer have access to the Department's ALPR without approval from the Chief of Police.

Data Protection: Flock confirmed that images of license plates and vehicles are purged after 30 days.

Network Audit: The Department is currently conducting a statewide analysis of its network (January–June 2025). Due to the presence of personal information, certain data must be redacted before release. Preliminary audit revealed there were 171,407 statewide searches during the month of January. On January 27–28, 2025 Palos Heights PD conducted 28 searches and listed the reason as "immigrations violation." Additionally, the Department has not identified any agencies that specifically searched only Oak Park ALPRs.

Flock Safety Response

In response to the violations, Flock Safety implemented system-wide enhancements effective June 12, 2025, aimed at preventing similar occurrences. [Click here](#) for Flock Safety's Response.

Next Steps

The Police Department is committed to serving with integrity and values community engagement. An FAQ and an annual Surveillance Report are forthcoming.

For questions, please contact Shatonya Johnson, Chief of Police, via email at sjohnson@oak-park.us or by phone at 708.358.5503

cc: Lisa Shelley, Deputy Village Manager
Ahmad Zayyad, Deputy Village Manager
Jack Malec, Assistant to the Village Manager
All Department Directors
Christina M. Waters, Village Clerk