

# Automated License Plate Readers In Iowa:

*Review and Recommendations*

**ACLU**  
Iowa

## Acknowledgments

This report was researched and written by Mia Savicevic and Ethan Miner, 2026 J.D. candidates at the University of Iowa College of Law. They were supervised by Megan Graham, Clinical Associate Professor at the University of Iowa College of Law and Director of the Technology Law Clinic. Invaluable administrative support was provided by Ashley Peterson and Mishelle Eckland. We are also grateful for the review and feedback we received from the other members of the Technology Law Clinic.

We'd also like to thank the Iowans who are impacted by ALPRs in their communities who have shared their concerns and information with us.

Thank you to the staff from the various agencies who assisted with our records request. Your cooperation was essential to the completion of this report.

**About this Report:** The ACLU of Iowa retained the Technology Law Clinic to research and draft this report. The views and research contained in the report do not express the views of the University of Iowa or the University of Iowa College of Law.

Because automated license plate reader (ALPR) proliferation has been rapid, this report provides a useful snapshot in time for the public and policymakers to account for current usage, policies, and training in surveyed jurisdictions in the Fall of 2025. It is not a comprehensive or permanent accounting of all ALPR use in the state. The clinic prioritized requesting records from agencies that are known to have ALPRs and to survey a variety of regions within Iowa. It is possible that the agencies have made changes after providing records.

Copyright © 2025

Technology Law Clinic at the University of Iowa College of Law  
and ACLU of Iowa

**IOWA**

College of Law  
Technology Law Clinic

**ACLU**  
Iowa



This work is licensed under CC BY-NC-ND 4.0. To view a copy of this license, visit <https://creativecommons.org/licenses/by-nc-nd/4.0/>.

## Table of Contents

Executive Summary .....	2
About This Report .....	6
I. Overview of ALPRs .....	7
A. What Do ALPRs Look Like? .....	7
B. How Do ALPRs Work? .....	8
C. Data Sharing.....	9
II. Rapid and Unregulated ALPR Use Puts Iowans at Risk.....	10
A. Why ALPR Usage Is Increasing Across the Country .....	10
B. How ALPRs Are Harming Communities Nationwide .....	10
C. How Rapid ALPR Integration Can Harm Iowans .....	12
III. (In)Adequacies of Existing Protections.....	13
A. Federal Protections .....	13
B. Other States' Protections.....	14
C. Iowa's Protections.....	15
IV. Obtaining and Evaluating Public ALPR Records.....	16
V. Findings About ALPR Use in Iowa .....	17
A. Contracts, Invoices, and Memoranda of Understanding .....	18
B. Policies.....	19
C. Inventory Lists .....	20
D. Search Logs, Audit Logs and Transparency Portals .....	21
E. Erroneous Hotlist Hits and Unauthorized Access.....	23
F. Job Titles Given Access.....	23
G. Training Documents.....	24
VI. Unmet Need for Minimum Statewide Protections .....	25
A. Comprehensive Statewide Legislation .....	25
B. Local Review of Policies and Contracts .....	27
VII. Conclusion.....	28
Appendix A: Records Request Template .....	29
Appendix B: Complete List of Agencies Surveyed in this Report .....	31
Appendix C: Records Obtained from Agencies.....	32
Appendix D: Iowa Agencies Known to Have Access to Flock ALPR Database .....	36
Endnotes.....	38

## Executive Summary

This report is a focused look at the growing use of automated license plate readers (ALPRs) by law enforcement agencies across Iowa—a surveillance tool that poses serious risks to Iowans’ privacy and civil liberties.

ALPRs are not speed cameras. They are not “red light” cameras. Instead, they are cameras used along roadways throughout Iowa that quickly take thousands of snapshots of license plates as vehicles drive by. That information can then be fed into a network of nationally shared databases that has too few privacy protections and is subject to abuse.

More details about ALPRs generally can be found on [the ACLU of Iowa website](#).

Unlike other traffic cameras, ALPRs aren’t activated because you violated a law. They record you and every other person who drives by, simply to build a database of vehicle information.



ALPRs can take hundreds of photos in a matter of minutes. And unlike ordinary surveillance cameras, where data is either not shared or shared in a more limited manner, the main purpose of ALPRs is to feed this information into a database.

To investigate how this technology is being used, the ACLU of Iowa engaged the Technology Law Clinic at the University of Iowa College of Law to conduct independent research on the use of ALPRs in Iowa.

We sent open records requests to a broad cross-section of 48 law enforcement agencies across the state, to larger towns, to smaller communities, and to Iowa’s college towns. The study was not comprehensive of all ALPRs in Iowa.

Of the 48 agencies that were selected, 5 did not respond to our records request before publication: the Des Moines Police Department, the Clinton Police Department, the Fayette Police Department, the Fremont Police Department, and the Mills Police Department.

While researching this project, the clinic also identified agencies (see Appendix D) that have accessed other Iowa cities’ or counties’ ALPR databases, whether they have their own ALPRs or not.

### Law Enforcement Agencies Surveyed for This Report

- |   |  |
|---|--|
| 1. Adams County Sheriff   | 27. Iowa Department of Public Safety/<br>Division of Intelligence and Fusion<br>Center |
| 2. Altoona Police Department  | 28. Iowa Department of Public Safety/<br>Iowa State Patrol                             |
| 3. Ames Police Department   | 29. Johnson County Sheriff   |
| 4. Ankeny Police Department   | 30. Johnston Police Department   |
| 5. Appanoose County Sheriff   | 31. Linn County Sheriff  |
| 6. Bettendorf Police Department   | 32. Marion Police Department   |
| 7. Black Hawk County Sheriff  | 33. Marshall County Sheriff  |
| 8. Cedar County Sheriff's Office  | 34. Marshalltown Police Department   |
| 9. Cedar Falls Police Department  | 35. Mills County Sheriff   |
| 10. Cedar Rapids Police Department  | 36. Newton Police Department   |
| 11. Centerville Police Department   | 37. North Liberty Police Department  |
| 12. Clinton County Sheriff  | 38. Oelwein Police Department  |
| 13. Clinton Police Department   | 39. Polk County Sheriff  |
| 14. Clive Police Department   | 40. Pottawattamie County Sheriff   |
| 15. Coralville Police Department  | 41. Scott County Sheriff   |
| 16. Council Bluffs Police Department  | 42. Storm Lake Police Department   |
| 17. Davenport Police Department   | 43. Story County Sheriff   |
| 18. Des Moines Police Department  | 44. Urbandale Police Department  |
| 19. Dubuque County Sheriff  | 45. Warren County Sheriff  |
| 20. Dubuque Police Department   | 46. Waterloo Police Department   |
| 21. Fayette County Sheriff  | 47. Waukee Police Department   |
| 22. Fremont County Sheriff  | 48. West Des Moines Police Department  |
| 23. Glenwood Police Department  |  |
| 24. Indianola Police Department   |  |
| 25. Iowa City Police Department   |  |
| 26. Iowa Department of Public<br>Safety/Division of Criminal<br>Investigation |  |

Separately from the report, the ACLU of Iowa has been compiling a larger list of Iowa communities and law enforcement agencies that have ALPRs. You can view that [here](#).

Some of this report's key findings include:

- **ALPRs have expanded rapidly in Iowa, building an enormous and powerful surveillance network, sometimes assisted by artificial intelligence.** Together, the cameras and data in this network can track individuals' movements, habits, and associations, often without their knowledge or consent. They allow those with access to the network to build a detailed profile of people's lives with little oversight or transparency. But no state law, local ordinance, or policy that we reviewed required law enforcement to get a warrant to use these databases to target or track people in this way.
- **The number of ALPR cameras in a community can vary widely.** Of those communities reporting how many ALPR cameras they use (some declined to share this

information), Cedar Rapids had the most with 76. West Des Moines reported 64; Clinton County 58, Altoona 51, Council Bluffs 37, and Dubuque 22. (See page 21.)

- **Some agencies were not transparent about the number and location of their ALPRs.** Bettendorf and Oelwein claimed that information about the number and location of their ALPRs would be confidential under Iowa open records law and declined to provide them. Altoona and Davenport said the number and location were confidential, but an online search found an informational website provided by the ALPR vendor that publicly listed the number of cameras.

- **There are vast inconsistencies in the use and regulation of ALPR data in Iowa, including how data is retained, deleted, what information is publicly available, and who can access the data.** This is detailed in a large chart of Iowa agencies' ALPR policies in Appendix C starting on page 32.

- **Iowa has no meaningful limits on the collection and use of ALPRs and a person's access to the data being collected on them.** That's in part because the court process is slow and has not kept up with the fast rise of the technology. Except for a few early cases, all outside of Iowa, the courts have not had time yet to even consider cases where ALPR tracking was used and weigh if and how constitutional protections at the state and federal level should apply to protect us.

Various structural barriers to getting into court, like qualified immunity for police, means the courts are not likely to be able to provide residents with timely, robust safeguards of our rights against the technology, which is here and being used right now.

- **Government officials are often not well-informed about ALPRs.** City councils and county boards of supervisors, who should be overseeing the implementation of ALPRs in their communities, often lack important knowledge about what they are, how they work, and what the privacy implications for their constituents are.

The study cites a recent situation in Coralville where residents responded to this lack of knowledge and demanded the city council collect more information on the impact of ALPRs in their community. (See page 12.)

- **ALPRs can be inaccurate.** Their use nationally has resulted in incidents when ordinary people were flagged as a dangerous, stopped, and detained by police—sometimes at gunpoint—due to ALPR errors. A separate study found that 1 in 10 ALPR readings contain an error.

- **Access to ALPR databases has been abused.** With so little oversight, ALPR access can be grossly misused. There are recurring national media accounts of law enforcement officers using them to stalk an ex-girlfriend or ex-wife. Texas police used their access to ALPR networks to search 83,000 cameras nationwide to track down a woman who had an abortion in Illinois, where abortion care remains legal.

The clinic identified that some Iowa law enforcement agencies possessed records which related to unauthorized access or erroneous hotlist hits. Unfortunately, with the sole exception of Story County, which provided a record of erroneous hotlist hits, law

enforcement claimed that records relating to unauthorized access of ALPR data and erroneous hotlist hits were confidential and refused to provide them.

- **The price of local government surveilling Iowans in their communities is steep.** Communities spend anywhere from a few to several thousand dollars each month for these cameras. Cedar Rapids, for example, spends an average of more than \$20,000 a month on ALPRs.

- **Vendors that offer ALPRs have not always been forthcoming on who they share the data with and their business practices.** Flock Safety, the largest vendor of ALPRs in Iowa, has specifically said that it does not give access to Immigration and Customs Enforcement (ICE) or U.S. Border Patrol. But nationally, local police have been found to regularly run searches on ICE's and Border Patrol's behalf. After finding this out, some communities around the country have terminated their contracts with Flock Safety.

*The documents collected as part of our open records requests can be viewed at <https://tinyurl.com/IowaALPRs>*



## About This Report

Automated license plate readers (ALPRs) are becoming increasingly common in the United States—including in Iowa towns and cities. ALPRs are designed to take high-quality pictures of license plate information on cars, even if the cars are moving at high speeds. This information is then collected and often shared with national, centralized databases.

ALPR companies then sell access to their network of data and software to law enforcement agencies to search for, identify, investigate, and track vehicles using the ALPR data. The software can also compare license plate picture data with “hotlists” to find matches with the license plates of persons of interest.

ALPRs have recently made headlines nationwide because of their rapidly expanding use, including the nationwide sharing of locally collected ALPR data, and stories of improper use by law enforcement personnel.

Many of Iowa’s cities and counties—and the state—have already started using ALPRs or intend to do so soon. Unfortunately, given the speed at which these devices are being acquired and deployed, people—including local officials responsible for oversight of law enforcement—often do not fully understand how this technology works, why and where it is being deployed, whom its data is being shared with, or what safeguards are needed to protect individual rights.

Officials not having sufficient information results in insufficient regulations of ALPR use in Iowa—or, worse, no regulation at all. Without regulation, we are likely to see abuses of ALPR systems similar to what has happened in other states, if they have not occurred already. And even without specific instances of misconduct, pervasive ALPR use will result in excessive surveillance of Iowans by the government and have a chilling effect on people’s right to move about freely and anonymously in public.

To learn more about how ALPRs are being used in Iowa, we sent public records requests to 48 police departments, sheriff’s offices, and similar government agencies across the state.

Using the template language in Appendix A, we requested financial documents, policies, oversight documents, and training documents related to ALPRs. We sent requests to the agencies listed in Appendix B so we could better inform the public and policymakers about the use of ALPRs in Iowa. The results of our research as of the publication of this report can be found in Appendix C.

The information the clinic requested is not comprehensive. The Clinton Police

### Hotlists and Hits

**Hotlists** are lists of known license plates or vehicles of interest that trigger real-time alerts to officers when a match is detected.

Typically, stolen vehicles or vehicles associated with unlawful activities make up these lists.

Certain hotlists are plagued with inaccuracies, like the one generated by the National Crime Information Center, which is expressly exempt from federal accuracy and reliability requirements.

**A hotlist hit** is what occurs when law enforcement is notified that the data from a particular plate scan matches a plate of interest on a hotlist.



Department, Des Moines Police Department, Fayette County Sheriff's Office, Fremont County Sheriff's Office, and Mills County Sheriff's Office did not respond to our request before publication.

Others asserted that confidentiality applies under Iowa's open records law and withheld some records.

The information the clinic has received has helped us better understand how ALPRs are being used in the state today, what policies are in place to protect Iowans, and what oversight mechanisms exist.

This report was designed to be public-facing, meaning that it was drafted to be accessible to most audiences, not just policymakers and attorneys. This style of drafting makes the report more valuable as a tool for improving transparency and public oversight of law enforcement, a principle at the heart of our democratic system. We hope to help build community awareness of ALPR use in Iowa and to help people understand the privacy harms that will ensue without regulation.

The report begins by outlining what ALPRs are, how they work, and the types of information they collect. We then discuss instances where Iowa municipalities have been unprepared for how to handle ALPR data. We highlight instances of abuse of ALPRs that have occurred elsewhere in the nation. We follow this discussion by outlining what federal and state protections are already in place and what civil liberties are at risk from widespread unregulated ALPR usage. Finally, we will discuss the findings of our records requests and offer information about policies that are available to govern ALPR use.

## I. Overview of ALPRs

ALPRs have two key parts: (1) a camera that takes high-quality pictures at high-speed, and (2) software that digitizes the picture and analyzes the resulting plate data.<sup>1</sup> Below, we talk about each part of the ALPR system in more depth.

### A. What Do ALPRs Look Like?

The camera part of ALPRs can be:

- **Stationary.** This type is generally attached to poles or buildings near roadways. For example, they may be found on traffic signal poles or toll plazas. These cameras are sometimes solar-powered and wirelessly connected, allowing them to be used at any location.<sup>2</sup>
- **Mobile.** These cameras are usually mounted on patrol cars and capture data from vehicles as the patrol car drives around.<sup>3</sup>
- **Portable.** This type of camera is built into small vehicle-trailers allowing them to be placed on any roadway or parking lot.<sup>4</sup> They are portable because the trailer can be easily moved around, but they take pictures from a stationary location.
- **Covert.** These cameras are discreetly incorporated into everyday objects so that they can scan license plates without alerting the public.<sup>5</sup> Covert cameras can be

incorporated into an unlimited number of everyday items, some options include traffic cones, cartop carriers, toolboxes, and electric pole boxes.<sup>6</sup>

By using a network of different types of ALPRs, municipal governments and counties can extensively surveil their residents' movements and activities.

## **B. How Do ALPRs Work?**

ALPR systems involve high-speed, high-quality cameras and software that analyzes the images. While they, too, involve mounted cameras, ALPRs are very different than speed or red-light traffic cameras (sometimes call automated traffic enforcement systems or ATEs). ALPR cameras take pictures of all vehicles traveling in their view. The “view” for these purposes is determined by, for example, the type of camera lens and the angle it is set to. By using character recognition, the software recognizes and records the license plate information and other car characteristics.<sup>7</sup> This information is stored in an ALPR database and can be accessed by law enforcement seeking to identify information about vehicles.<sup>8</sup>

Many companies sell ALPR cameras and software to the government. Some of the biggest players are Flock Safety (Flock), Motorola Solutions (the parent company of Vigilant Solutions), Leonardo, Insight LPR, and Axon Enterprises, but there are also others.<sup>9</sup> Regardless of the company, ALPR cameras and software are relatively similar, although what hot-lists the data is run against, how long the data is stored, and who the data is shared with can vary significantly. Many of the companies provide access to tools and data sets that enable law enforcement to piece together a very detailed picture of someone's vehicle and life.

ALPR software allows authorized law enforcement personnel (users) to run different types of searches.<sup>10</sup> Users can search for vehicles by plate number, or through searches for a particular geographic location, specific types of vehicle, or by date and time.<sup>11</sup> Some ALPRs can even detect other vehicle characteristics, such as a bumper sticker.<sup>12</sup> Others can even filter by biometric data like facial recognition technology.<sup>13</sup>

For example, many ALPR companies have tools that let users track many details about any given vehicle. Flock calls this feature Vehicle Fingerprint<sup>14</sup> and it tracks:

- Vehicle make
- Resident vs. non-resident vehicle
- Body type (sedan, SUV, pickup truck, golf cart, trailer, bicycle, etc.)
- Type of plate (standard, temporary, special)
- Vehicle color(s)
- Missing plates
- License plate state
- Time and location
- Other characteristics (roof racks, bumper stickers, dents, animals, etc.)

Users can then search through this data to identify and track vehicles or individuals. For users of Flock ALPRs, by combining this information with another Flock product—Flock Nova—users can access other information about the vehicle owner based on police and

public records.<sup>15</sup> Finally, for Flock users, platforms like Flock FreeForm, an artificial intelligence-powered search tool, enable users to search through their data to find pictures that match the user's search terms.<sup>16</sup>

### C. Data Sharing

ALPR systems also have unique data-sharing capabilities. Many ALPR manufacturers boast about how extensive their data sharing networks are. The networks allow municipalities and counties to view data from other agencies, both in and out of state, while some—like Flock ALPRs—allow other Flock customers from all over the world to view locally collected ALPR data.<sup>17</sup>

Unlike speed or red-light traffic cameras, which capture images only when a specific violation occurs, ALPRs collect high volume of data on every passing vehicle regardless of wrongdoing. Because red-light camera data is tied solely to a specific violation (like speeding or running a red light), it is retained for a short period of time and is shared only with the driver through a citation. In contrast, ALPR data is routinely stored for much longer periods and is often automatically shared across broad law enforcement networks, including with local, state, and federal agencies, like ICE,<sup>18</sup> and even private companies.<sup>19</sup> Once they have access these agencies can search through the historical data recorded by ALPRs, through a nationwide lookup tool.<sup>20</sup> This expansive sharing, combined with the volume and sensitivity of ALPR data, enables agencies to build detailed records of vehicle movements. This all makes ALPR systems fundamentally different from red-light traffic cameras in both scope and privacy impact.

For example, if an individual was suspected of committing a crime in West Des Moines and a vehicle associated with that person drove past an ALPR camera in North Liberty, West Des Moines's police could be alerted to the hit even though it is far outside of their normal jurisdiction. This alert would typically occur even if the suspect was spotted by an ALPR in another state, so long as the agencies have agreed to share their ALPR data. An "agreement" in this context does not necessarily mean that a formal memorandum of understanding (MOU) or data sharing agreement has been signed; an agency can simply opt in to sharing data with other customers of an ALPR system or to accessing other jurisdictions' information, which they often inadvertently do. This is because those agreements are contained in the ALPR company's standard contract. Flock's standard contract contains a "worldwide" license to use and share collected ALPR data. That means data collected by an ALPR in Clive could be shared with the government of Cuba.<sup>21</sup> Limitations on data sharing can be implemented by the local police department or county sheriff's office, but there are no statewide limits in Iowa about who can access Iowans' data.

Agencies do not need to have their own ALPR systems to access other agencies' ALPR data.<sup>22</sup> For example, Appendix D contains a list of Iowa agencies that have access to Flock data. But not all of them have Flock cameras. The asserted justification for this widespread data-sharing is to help law enforcement agencies solve crimes faster both inside and outside of their jurisdiction.<sup>23</sup> Unfortunately, without adequate regulations in place, there are no safety rails preventing improper access or misuse of Iowans' personal information, both in Iowa, and by actors outside of our state, some of whom may not have the best interest of Iowans at heart.

## II. Rapid and Unregulated ALPR Use Puts Iowans at Risk

ALPRs are widely marketed as powerful tools for law enforcement. This marketing has paid off: law enforcement has rapidly integrated ALPRs into both rural and metropolitan areas of Iowa.<sup>24</sup> At least 62 Iowa law enforcement agencies, and innumerable agencies outside of Iowa, have access to Iowa ALPR data.<sup>25</sup> This integration of ALPRs has left some city councils and county boards of supervisors unprepared when introducing the technology in their communities. Without informed policymakers adopting comprehensive statewide minimum protections for ALPR use, it is only a matter of time before Iowans face the same kinds of misuse and exploitation seen elsewhere across the country. Iowa must establish strong baseline safeguards that local governments can build upon and strengthen.

### A. Why ALPR Usage Is Increasing Across the Country

ALPRs are powerful technology: they provide a massive repository of information about people's present and past movements across jurisdictions without requiring an officer to collect it. When coupled with other tools, law enforcement can use ALPRs as a comprehensive surveillance scheme that leaves little unknown about individuals' personal lives.

Unfortunately, law enforcement usage of ALPRs has been accompanied by widespread abuse. Additionally, some agencies around the country have used ALPRs to generate revenue through increased ticketing of drivers and using hotlists to follow up on outstanding tickets.<sup>26</sup> Together, these practices reveal how a tool marketed for public safety can easily instead become a money-maker for localities and a vehicle for mass surveillance without reasonable minimum limits on its use.

### B. How ALPRs Are Harming Communities Nationwide

As ALPRs have become more prevalent, so have stories of their shortcomings and harms to everyday Americans. Many news reports have been published in recent years about citizens who have been wrongfully stopped because of false ALPR hotlist hits.<sup>27</sup>

The stories below highlight the fact that ALPRs are not always accurate, and their errors can easily lead to dangerous situations for innocent drivers and potentially for the officers who are relying on bad ALPR data. In the stories, officers treated these encounters as "felony stops," that is, a traffic stop where the officers believe there was a possibility of violence, so they gave orders at gunpoint to maintain control. Such traffic stops are high-risk and can go very badly, very quickly. For example:

- **Spring 2009.** In California, after Denise Green dropped her sister off at a train station, an ALPR automatically issued a stolen vehicle alert when she drove past it.<sup>28</sup> Officers pulled Green over, held her at gunpoint, and had her kneel on the ground for 20 minutes before they realized their error and let her go.<sup>29</sup> In Green's case the ALPR system mistook a 3 for a 7 on her license plate.<sup>30</sup>
- **Fall 2018.** Brian Hofer and his younger brother were driving home for Thanksgiving in northern California when a false ALPR hit mistook their vehicle as stolen.<sup>31</sup> The two brothers were held at gunpoint during the incident.<sup>32</sup>

- **Spring 2021.** Jason Burkleo was restrained and forced to lie on his stomach on the side of roadway after an ALPR mistook his car as stolen in California.<sup>33</sup> What really happened was that the ALPR mistook an H for an M on his license plate.<sup>34</sup>
- **Winter 2024.** In Colorado, Brittney Gilliam and her family—four children—were pulled out of their car and held at gunpoint after an ALPR mistook their car as a stolen vehicle.<sup>35</sup> Even the youngest, a six year old girl wearing a pink tiara, was forced to lie on the ground, and Gilliam was placed in a patrol car in handcuffs.<sup>36</sup> The ALPR system had mistaken Gilliam’s SUV with Colorado plates for a motorcycle with Montana plates.<sup>37</sup>
- **Winter 2024.** Jaclynn Gonzales was held at gunpoint while her 12-year-old sister was placed in a patrol car because the ALPR issued an alert after reading a 2 as a 7 on her license plate.<sup>38</sup>
- **Fall 2025.** Chrisanna Elser was approached at her home by police claiming ALPRs recorded her stealing a package. Luckily her car had built-in cameras that helped to prove her innocence.<sup>39</sup>

These types of errors are not uncommon. One study found that 1 in 10 readings contain an error.<sup>40</sup> Given that there are over 20 billion<sup>41</sup> (and growing) readings stored in Flock systems alone, the numbers of probable ALPR errors resulting in potentially dangerous interactions for innocent drivers and their families is staggering.

Beyond ALPR mistakes, there is the problem of intentional misuse. Reporting from around the country shows documented instances of law enforcement officers accessing ALPR data for unauthorized personal uses.

One significant example of ALPR misuse involves immigration enforcement, where ICE and Border Patrol have used connections with local law enforcement officers to have these officers search the databases and provide the results which are then used to locate, track, and detain immigrants.<sup>42</sup>

Other examples of misuse include:

- **Summer 2023.** The police chief in Sedgwick, Kansas used Flock to track his ex-girlfriend and her new partner.<sup>43</sup> The former police chief ran a total of 228 searches through the Flock database to track both of their vehicles.<sup>44</sup>
- **Fall 2022.** A lieutenant in the town of Kechi, Kansas, was found to have misused Flock data to stalk his estranged wife after she expressed concerns to the authorities that she was being followed.<sup>45</sup> He accessed the Flock cameras in Wichita to stalk his ex-wife, using all sorts of false reasons for accessing the database, like “missing child” and “drugs.”
- **Summer 2024 to Fall 2025.** Nationally, more than 80 law enforcement agencies searched racist phrases into ALPR databases to locate people. The slurs were targeted towards the Romani population, with officers out of Sioux City, Iowa searching disturbing phrases such as “Traveling Romanian Theft Group.”<sup>46</sup>
- **Spring 2025.** Maybe one of the most disturbing stories of ALPR data being improperly used was in Texas. A law enforcement officer justified an ALPR search

by writing, “had an abortion, search for female.”<sup>47</sup> The officer accessed data from 83,000 Flock cameras, including in states where abortion remains legal.<sup>48</sup> This example raises serious concerns about cross-jurisdiction surveillance, privacy violations, and the misuse of technology to evade state laws.

These are not the only stories of ALPR misuse, but they are certainly some of the most disturbing. If Iowa continues to let ALPRs go unregulated at the state level, there is a high likelihood that similar stories will show up in Iowa headlines.

Beyond mistakes and abuse, there are good-governance and oversight concerns. Put succinctly, one of the biggest challenges with ALPRs is that the public simply does not always know that, or how, ALPRs are being used.<sup>49</sup> Most towns, cities, counties, and states do not proactively disclose or explain their use of ALPRs. Even where an ALPR system asks officers to justify their search, it is common for their explanations to be generic—e.g., “investigation” or “hit and run” without any additional detail.<sup>50</sup>

As the stories show, the lack of regulation of this surveillance technology opens up individuals to harms. Some of those harms are known—like the example about the officer using a search query to look for women who had abortions. Some of the harms result from the invasion into individuals’ privacy that happens when the government is tracking their general movements. And, of course, when people know their vehicles are being watched and tracked, they may limit their public movements and activities accordingly—which “chills” the exercise of their constitutional rights.

### **C. How Rapid ALPR Integration Can Harm Iowans**

While most of the stories above are from outside of Iowa, the harms they highlight could easily happen here. And that risk is not hyperbolic; we have evidence that elected officials in towns, cities, and counties are making decisions about implementing ALPRs without a full understanding about how ALPR systems work, the risks they may pose to their residents and visitors, and the integrity of law enforcement investigations.

For instance, during the summer of 2025, the Coralville City Council approved the city’s budget, which included an ALPR contract with Flock where they “found nothing alarming.”<sup>51</sup> Even though the city council had already approved the contract with Flock, at a later meeting, many Coralville residents publicly opposed the Flock contract. Two council members believed more information was needed before the city should begin using the ALPRs, and most residents did not want any ALPRs in their community.<sup>52</sup> Two city council members shared this belief, and the integration of the ALPRs was paused so they could obtain more information.<sup>53</sup> The city council decided that they would like to hear from a Flock representative at a future meeting to address questions and concerns they had about the technology.<sup>54</sup> These concerns included things like data ownership, data retention, data storage, and how the cameras work.<sup>55</sup> But despite pushback from the community, the city council decided to move forward, largely without addressing the concerns around data sharing and how the data would be used.

Additionally, as discussed more in the Findings section below, some towns, cities, and counties are installing and using ALPRs without any or with inadequate public policies in place. After learning more about the technology, numerous agencies have later cancelled



their contracts with ALPR vendors.<sup>56</sup> Iowans' data that is collected in most jurisdictions can be automatically shared with law enforcement out of state without any limits.<sup>57</sup> And other cities and towns place no limit on how long ALPR data can be retained, meaning it can be searched to create a picture of someone's daily movements months or years down the road.

### III. (In)Adequacies of Existing Protections

Because ALPR use is not harmless, the next important question is whether existing legal protections adequately prevent and address those harms. When considering protections against the sorts of harms presented by ALPRs, there are many options; protections could be found in the federal or state Constitutions and laws, or in other sources like policies, guidance, and similar types of documents.

Unfortunately, there is little indication that existing law, set forth below, is adequate.

#### A. Federal Protections

ALPRs potentially implicate a number of federal rights, including the rights to free movement, freedom of association, and to be free from unreasonable searches and seizures by the government.

However, it remains unclear how the courts will apply these protections to ALPRs, highlighting a current lack of clear, uniform, specific regulation of their use. There are also numerous barriers in using the court system to try to protect these rights against ALPRs—both legal, like qualified immunity and other structural barriers, and practical, in the case of those who will never even know they are being surveilled by ALPRs in any particular instance, and the necessary commitment of time and resources to bring litigation.<sup>58</sup> Unfortunately, despite the potential for ALPRs to curtail Iowans' rights, absent the adoption of express regulations, the only way to realistically opt-out of ALPR recognition is for people to limit their own movement,<sup>59</sup> which is not a practical choice for most Iowans.

**Freedom of Movement.** The United States Supreme Court has consistently recognized that the Constitution protects the rights to travel and free movement.<sup>60</sup> The right to travel is a fundamental right and stems from multiple constitutional provisions, including the Privileges and Immunities, Dormant Commerce, and Assembly Clauses.<sup>61</sup> The right to free movement is a hallmark of free and democratic societies because restrictions on travel can hinder civil engagement.<sup>62</sup>

However, the right to travel is not unbounded. There are many carveouts<sup>63</sup> and it most robustly protects people's ability to travel from one state to another rather than within a state.<sup>64</sup> As a result, the right only provides limited protection from ALPR misuse.

**Freedom of Association.** The First Amendment protects freedoms related to speech, assembly, and religion.<sup>65</sup> These include the freedom of association.<sup>66</sup> The freedom of association establishes the right to join with others<sup>67</sup> without excessive government interference.<sup>68</sup> A person's freedom of association is also violated when laws or regulations have a "chilling effect on association."<sup>69</sup> Even absent a tangible restriction on association, a law or regulation that foreseeably presents a challenge for individuals to associate violates Iowans' freedom of association.<sup>70</sup> An example of this type of chilling resulting from ALPRs



is that ALPR data can be used to identify patterns of when cars frequently appear near one another, which reveals an association.

**Freedom from Unreasonable Searches and Seizures.** The Fourth Amendment explicitly protects people from unreasonable searches and seizures by the government.<sup>71</sup> Unless covered by an exception,<sup>72</sup> before conducting a search, the government must secure a warrant supported by probable cause.<sup>73</sup> The warrant must particularly describe the place, persons, or things to be searched, and the probable cause finding must be based on a sworn affidavit.<sup>74</sup> A warrant is typically required when someone has a reasonable expectation of privacy in something.<sup>75</sup>

Currently, law enforcement agencies search ALPR databases to track individuals without first obtaining a warrant. Those searches happen across jurisdictions and states. To put it plainly: nearly every person who drives within Iowa could have their vehicle data pulled from a database, regardless of whether there is any individualized suspicion that they are a party to a criminal investigation or not.

Several state courts have written opinions about whether and how the Fourth Amendment applies to ALPRs, but there are no court decisions yet in Iowa. For example, in 2020, the Massachusetts Supreme Court ruled on the issue of whether ALPRs constitute a Fourth Amendment search.<sup>76</sup> Although they held that the use of ALPRs was not a search (requiring a warrant unless an exception existed), they stated that if there had been more cameras, including around “constitutionally sensitive locations” it may have been.<sup>77</sup> This distinction was also applied by a Virginia court, which found that searching a Flock ALPR database *was* a search under the Fourth Amendment.<sup>78</sup>

This is a developing area of law, and the courts might limit unwarranted searches using ALPRs in future cases. That is because the advanced features of ALPR technology, and the increasing number of cameras, means that searching could provide the government with information on “the whole of [one’s] movement.”<sup>79</sup>

\* \* \*

The constitutional protections discussed above are intended to shield Iowans from unrestricted government surveillance and interference. Yet these protections are complicated, have many carveouts, and it remains unclear how these rights apply to ALPR searches in Iowa.<sup>80</sup> The lack of robust federal protection, combined with a lack of regulation of ALPRs at the state and local levels to protect Iowans’ rights, leaves Iowans vulnerable.

## **B. Other States’ Protections and Laws**

We now have a patchwork of state ALPR laws. The Iowa legislature has not adopted any meaningful statutes to protect its residents from ALPR misuse,<sup>81</sup> but several other states have. Twenty-two states have passed statutes to protect their citizens from ALPR use in one way or another.<sup>82</sup> In the Midwest, Illinois, Kansas, Minnesota, and Nebraska have ALPR statutes.<sup>83</sup>

Nebraska’s statute protects residents in several ways including, importantly, prohibiting ALPR use except for specific uses.<sup>84</sup> The statute limits the data retention period<sup>85</sup> and

requires an annual report on ALPR usage.<sup>86</sup> Nebraska prohibits data sharing except for a few enumerated instances.<sup>87</sup>

Minnesota has a statute designed to protect residents from ALPR misuse. The statute mainly limits when and how data can be collected,<sup>88</sup> used,<sup>89</sup> shared, retained, and destroyed.<sup>90</sup> For example, the information that an ALPR can record is limited to: license plate numbers; the date, time, and location data on vehicles; and pictures of license plates, vehicles, and areas surrounding the vehicles.<sup>91</sup> Additionally, data that is not subject to criminal investigation must be destroyed after 60 days.<sup>92</sup>

Illinois's ALPR law creates strict limits on how license plate data can be used, prohibiting sharing data for investigations related to lawful reproductive health care or a person's immigration status.<sup>93</sup> It also bars sharing data with out-of-state agencies without a written assurance of compliance with the Illinois law and requires that all ALPR information be kept confidential.<sup>94</sup>

Kansas's statute is merely an update to the state's public records law and does not provide Kansans with meaningful protections. Unfortunately, by safeguarding secrecy about the location of ALPRs, it does the opposite. The law directs records requesters to send requests for ALPR information to the agency with the ALPR system, and it says that agencies do not have to disclose records that contain "captured license plate data" or would reveal the locations of ALPR cameras.<sup>95</sup>

### **C. Iowa's Protections**

With no meaningful state law in place and no court decisions challenging ALPRs under the U.S. or Iowa Constitutions, Iowans have less rights than some of our neighbors in the Midwest when it comes to ALPRs, not that any of these other states' statutes are the gold standard.

Nor do we know whether or how Iowa's equivalent of the Fourth Amendment—Article I, Section 8 of the state constitution—would apply.<sup>96</sup> Although the wording of Section 8 is nearly identical to the U.S. Constitution, the Iowa Supreme Court has often interpreted the provision to offer greater protections.<sup>97</sup> But without any caselaw on-point, it is impossible to know what the Iowa Supreme Court would say about whether the persistent surveillance conducted by ALPRs is constitutional.

Additionally, while state laws provide some protections to Iowans from automated traffic enforcement cameras,<sup>98</sup> they do not restrict how or when ALPRs are used.

Without state regulation, all that is left to limit ALPRs' use is a patchwork of local policies and practices that differ from town to town and county to county. What that means is that a person taking a drive across a handful of Iowa towns and counties will be subject to as many, and sometimes conflicting, policies, or no policies at all, even though ALPR technology could be used to track their movements and collect a trove of personal information about them.

## IV. Obtaining and Evaluating Public ALPR Records

We sent open records requests under Iowa Code Chapter 22 to 48 law enforcement agencies.<sup>99</sup> These specific agencies were chosen based on known ALPR usage, public reporting that ALPRs are located within the jurisdiction, documentation that the agencies have purchased ALPRs, and to survey a variety of regions within Iowa.

Our letters requested the following records:<sup>100</sup>

1. Contracts
2. Memoranda of understanding
3. Invoices
4. Policies
5. ALPR camera inventory lists
6. ALPR database search logs
7. ALPR database audit reports or trails
8. ALPR database transparency portal access
9. Records of erroneous ALPR hotlist hits
10. Job titles of personnel with access to the ALPR database
11. Records of unauthorized access to the database
12. ALPR user manuals, training materials, and similar documents used to educate users on ALPRs and related data systems

Chapter 22 of the Iowa Code requires agencies to provide public records promptly and as soon as feasible, although the law allows for delays of up to 20 calendar days in some cases, including when reasonably necessary to determine whether a record is confidential or should be released. However, delays should not normally exceed 10 calendar days.<sup>101</sup> Agencies can either deliver the records, give an estimate of when they will send the records, or explain why per statute they believe the requests contain confidential information and that they will not comply. We followed up at regular intervals and eventually received records from 43 agencies.<sup>102</sup>

The response to our open records request varied widely. The Davenport Police Department told us that all the information we requested was confidential.<sup>103</sup> However, we sent the same request to the Scott County Sheriff (the county where Davenport is located), and they provided arguably one of the most thorough responses of any agency.<sup>104</sup>

In some cases, law enforcement agencies said they didn't have transparency portals, which are public websites hosted by the ALPR vendor that contain selected key facts about the agency's ALPRs. Urbandale, Davenport, and Clive police departments all said they didn't have transparency portals,<sup>105</sup> but we were able to locate them through independent online research.<sup>106</sup>

## V. Findings About ALPR Use in Iowa

ALPR use in Iowa is rapidly expanding and the records we received provide insight into how local governments across the state are implementing ALPRs.

For each category of information, the agencies generally responded in one of four ways:

1. They provided the records requested.
2. They indicated they do not have “responsive” records, that is, they did not have records that they believed fit the description in our request.
3. They said records of what we requested exist, but they were unwilling to provide them because they believed they were confidential under Iowa law.
4. They said they did not have records but that even if they did, they would be confidential.

### Summary of Law Enforcement Agency Responses<sup>107</sup>

	Records Obtained	Had No Records	Confidential	No Records and Would Be Confidential	No ALPRs	No Response
<b>Contracts</b>	27	9	1	0	6	5
<b>Memorandum of Understanding</b>	8	28	1	0	6	5
<b>Invoices</b>	31	7	0	0	6	4
<b>Policies</b>	30	8	0	0	6	4
<b>Camera Lists</b>	23	12	2	1	6	4
<b>Search Logs</b>	13	17	8	0	6	4
<b>Audit Logs</b>	4	23	10	0	6	5
<b>Portal Access</b>	16	21	1	0	6	4
<b>Erroneous Hotlist Hits</b>	1	29	4	3	6	5
<b>Titles with Access</b>	24	12	1	0	6	5
<b>Unauthorized Access</b>	0	34	2	1	6	5
<b>Training Documents</b>	8	28	2	0	6	4

Our analysis of the responses provides substantial insight into ALPR usage in Iowa. We analyzed the records in seven broad categories: (1) contracts, invoices, and memoranda of understanding; (2) policies; (3) inventory lists; (4) search logs, audit logs, and transparency portals; (5) erroneous hotlist hits and unauthorized access; (6) access by job titles; and (7) training documents. Each is discussed below.

## A. Contracts, Invoices, and Memoranda of Understanding

The clinic sought contracts, invoices, and memoranda of understanding as part of its requests. We received responses related to these requests from 43 agencies. The clinic hoped to learn what ALPR vendors are most common in Iowa, how long agencies are contracting with vendors to use ALPR systems, and how much money agencies are spending.

While the contracts, invoices, and memoranda of understanding are not the same, they all show the financial relationships between government agencies and ALPR vendors. A **contract** refers to a legally binding document entered into by both parties that states the terms for the parties' deal or transaction. A **memorandum of understanding** (MOU) is a non-binding agreement between parties to enter into a collaboration together and generally work towards a common goal. **Invoices** provide a list of the services or goods that have been provided and their associated costs.

The clinic's research highlights that there are three primary ALPR providers in Iowa:

1. **Flock.** Flock Safety is by far the most heavily used ALPR vendor in Iowa, with 27 of the 43 agencies that responded having contracts with Flock Safety.<sup>108</sup> These agreements vary in length between one and five years.<sup>109</sup> The agreements have an average duration of 32 months, and the most common duration is for two years.<sup>110</sup> The average contract costs \$4,404.06 per month, with some contracts having an average monthly cost of more than \$20,800.00.<sup>111</sup> The highest single contract totals more than \$499,000.<sup>112</sup> Some of these contracts even included broad language that permits Flock to share the data "worldwide."<sup>113</sup>

The Flock MOUs shed some interesting light on the usage of ALPRs. The MOUs often included a discussion that usage is restricted as required by law and the agreed "purpose." However, the "purpose" in the Flock MOUs says they can be used "to gain awareness with respect to the communities for which they serve to protect and facilitate investigations."<sup>114</sup> Concerningly, this "purpose" could be interpreted to permit almost any conduct as long as it is legal, leaving the burden of creating real restrictions on local governments.

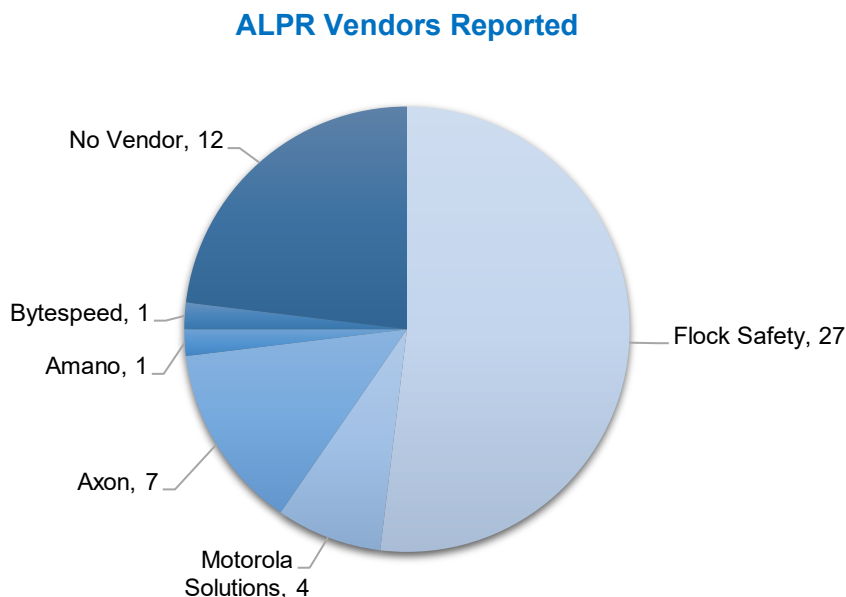
2. **Axon.** Axon is an ALPR vendor for 7 of the 43 agencies we received records from.<sup>115</sup> With contract lengths ranging from five years to ten years.<sup>116</sup> The average monthly expenditure of the Axon contracts is \$19,049.93. On the upper end, some counties spend an average of more than \$50,700.00 per month on contracts related to ALPRs,<sup>117</sup> with the single most expensive contract valued at over \$6 million.<sup>118</sup>

We did not receive any MOUs from an agency that purchased their ALPRs from Axon.

3. **Motorola.** Motorola Solutions, the parent company of Vigilant Solutions, has contracts with 4 of the 43 agencies that responded to the public records requests.<sup>119</sup> The average cost of the Motorola contracts is \$885.42 per month, although data on

the cost of Motorola contracts was very limited. The records did not provide information on the duration of the contracts.

A single agency provided a record of its MOU with Motorola's Vigilant Solutions.<sup>120</sup> Unlike the Flock MOUs, this MOU did not contain a limiting purpose.<sup>121</sup>



In summary, cities, towns, and counties spend a lot of money on ALPRs. The agencies that provided financial documents in response to the clinic's request, Iowa cities, towns, and counties, spend at least \$212,959.73 of taxpayer money per month on ALPRs.

## B. Policies

In response to the clinic's requests, 30 agencies provided records of their policies,<sup>122</sup> 5 agencies did not have an ALPR policy but have ALPRs,<sup>123</sup> 6 agencies did not have a policy in place but do not currently use ALPRs,<sup>124</sup> and 4 agencies did not respond.<sup>125</sup> Many of the agency policies that we received follow a standard format. For example, most Flock policies with agencies have only slight variations in their wording and contain identical provisions.<sup>126</sup> The ALPR policies focus primarily on scope, general policy, administration, operations, data collection and retention, accountability, and data sharing.

**Scope and Purpose.** Every policy we received contained a declaration of the scope or purpose of the ALPR policy.<sup>127</sup> Notably, 14 of the policies contain identical language in the scope or purpose section.<sup>128</sup>

**Administration.** This portion of the policy regulates how the agency may use the information collected by ALPRs. Some policies state that ALPR data may be used for active warrants, homeland security, electronic surveillance, and stolen property recovery. In the records we received, 24 policies consider the data gathered to be confidential and therefore not permitted for public review.<sup>129</sup>

**Operations.** Every policy we received narrows the use of ALPRs to only official law enforcement or traffic enforcement.<sup>130</sup> Potential provisions falling into this category would include restricting use to law enforcement, requiring training, requiring users to provide a reason for the data search, etc. Iowa City, for example, only uses ALPRs for parking enforcement.<sup>131</sup> In the Iowa City policy, the operation scope is strictly limited to parking enforcement. In contrast, the agencies that use ALPRs for law enforcement also usually include more specific limitations on use. Significantly, 18 agencies specifically state that “reasonable suspicion or probable cause is not required before using an ALPR.”<sup>132</sup> Additionally, 14 agencies state that verification of an ALPR hotlist hit is only required “[i]f practicable.”<sup>133</sup> Finally, 15 policies require that the user enter a “case number, or a detailed reason” before searching in the database.<sup>134</sup>

**Data Collection and Retention.** Every agency’s policies include language that limit the duration data can be stored.<sup>135</sup> Of the agencies that provided policies, 14 purge the data after 30 days, whereas 13 purge the data based on the records retention schedule.<sup>136</sup> If the data is going to be used as evidence or it is anticipated that the data may become evidence in a criminal or civil action, every policy permits the data to be downloaded to an external device and stored in accordance with the agency’s evidence policies.<sup>137</sup>

**Accountability.** In the policies we received, 27 agencies include guidelines on how users get access to the ALPR data.<sup>138</sup> For example, 24 agencies require that ALPR data can only be accessed through a login and password,<sup>139</sup> while 17 policies specify that the server will record the date, time, and user when a search of made.<sup>140</sup> Additionally, 24 agencies also require that a regular audit must be conducted.<sup>141</sup>

**Release of Data.** In the policies that were disclosed, 24 agencies specify that their data may only be shared with other law enforcement agencies or prosecutorial agencies for official use.<sup>142</sup> And 20 policies require the outside agency to submit a request to the agency.<sup>143</sup> Of these requests, 20 also require the third-party agency to state the reason for their request.<sup>144</sup> Concerningly, 3 do not require any reason.<sup>145</sup> This does not cover an ALPR vendor’s ability to share data when they have a right and license to the data per their contracts.<sup>146</sup>

One policy directly states that data will not be shared with ICE.<sup>147</sup> Yet, it’s not clear that this policy is followed, or that the protection is real or meaningful, in light of the known business practices of ALPR vendors. Specifically, evidence indicates that Flock does share information with ICE, albeit indirectly. At the end of summer 2025, Evanston, Illinois conducted an audit on Flock’s data sharing in their city and found that “Flock ‘allowed U.S. Customs and Border Protection to access Illinois license plate cameras on Illinois roads and surveil drivers.’”<sup>148</sup> The city promptly ordered Flock to take down the cameras following the discovery of this information.<sup>149</sup> Flock then put the cameras back up without the city’s consent.<sup>150</sup>

## C. Inventory Lists

In response to the clinic’s request, 23 agencies directly disclosed the number and/or location of their ALPR cameras,<sup>151</sup> 2 claimed this information is confidential per Iowa Code Chapter 22.7(50),<sup>152</sup> 12 said they did not have any records relating to the number or placement of



cameras,<sup>153</sup> 2 claimed the records were confidential even though the records are publicly available online,<sup>154</sup> and 5 did not provide any response.<sup>155</sup>

### Number of ALPR Cameras Reported by Agencies

Agency Name	Number of Cameras
Altoona Police Department	51
Ames Police Department	1
Cedar Rapids Police Department	76
Clinton County Sheriff	58
Clinton Police Department	8
Clive Police Department	20
Coralville Police Department	2
Council Bluffs Police Department	37
Davenport Police Department	9
Dubuque Police Department	22
Glenwood Police Department	1
Indianola Police Department	12
Iowa City	17
Johnston Police Department	11
Marion Police Department	16
Marshall County Sheriff	26
North Liberty Police Department	12
Scott County Sheriff	32
Storm Lake Police Department	8
Story County Sheriff	2
Urbandale Police Department	27
Warren County Sheriff	6
West Des Moines Police Department	64

### D. Search Logs, Audit Logs and Transparency Portals

To try to assess how ALPRs are being used in practice, the clinic requested search logs, audit logs, and transparency portals from the agencies.

**Search logs** typically cover the past 30 days and include information like the reason for the search, the date of the search, as well as other data, sometimes including identifiers of who conducted the search or anonymous license plate number information.

**Organizational audit logs** are similar, but they provide more in-depth information such as the name of the officer and other search variables.

**Transparency portals** summarize ALPR data on a publicly accessible website, the types of information available on transparency portals are at the discretion of the agency.

In total, we obtained records of 13 search logs, 4 organizational audit logs,<sup>156</sup> and 15<sup>157</sup> transparency portals.<sup>158</sup> Agencies often claimed that these categories were confidential.<sup>159</sup> For example, 10 agencies claimed their search logs were confidential,<sup>160</sup> 10 claimed their audit logs were confidential,<sup>161</sup> and 2 nonsensically claimed their transparency portals were confidential.<sup>162</sup>

And, confusingly, 2 agencies claimed their search logs were confidential and that they did not have records of a transparency portal.<sup>163</sup> However, the clinic was able to independently find their transparency portal which included access to their search logs.

## **Search Logs and Audit Logs**

Search logs and audit logs are theoretically useful to learn the reasons why law enforcement officers are searching within the ALPR database. However, reviewing the search logs in other states has revealed that officers typically use broad reasons like “investigation” to justify their search. After reviewing the search logs, they revealed that Iowa is no different. Agencies across the state often use vague reasons such as “investigation,” “suspicious,” “records,” or single letters as their reasoning.

We found in some cases the wording was too broad to provide meaningful oversight by the public. Clive used search terms like "unwanted person," "sus activity," and "Operation Homeless Intel."<sup>164</sup> Council Bluffs used terms including "snitch," "sus," and "na" (likely meaning "not applicable.")<sup>165</sup>

Our review of the audit logs is slightly more promising. Often these reports tie the search to a case number and provide a more specific statement of the reason for the search but are not perfect.<sup>166</sup>

## **Transparency Portals**

Some of the ALPR vendors provide transparency portals—which can be made available to the public—at no cost to the agency.<sup>167</sup> The portals often include information such as: what is and is not detected by the ALPRs, prohibited uses, the duration the ALPR data is retained, the number of cameras, the number of vehicles scanned, and the number of searches conducted.

The clinic analyzed the data in the transparency portals that we could identify. Between October 21, 2025, and November 20, 2025, there was an average of 219,325 vehicles detected per agency, 2983 hotlist hits per agency, and 237 searches run per agency. Of the 20 transparency portals we identified,<sup>168</sup> 12 disclose what other agencies they share with data with,<sup>169</sup> and 14 allow the public to view their search logs.<sup>170</sup>

Based on this transparency portal data, there are:

- At least 4,386,514 vehicle detections between October 21 and November 20.
- An average of 10,177 vehicle detections per ALPR camera between October 21 and November 20.
- 13 hotlist hits per 1000 vehicles detected between October 21 and November 20.

## E. Erroneous Hotlist Hits and Unauthorized Access

A hotlist refers to lists of known license plates or vehicles of interest that trigger real-time alerts to officers when a match is detected. Usually, stolen vehicles or vehicles associated with unlawful activities make up these lists.

The clinic received 1 record back from the 48 agencies with data relating to unauthorized access or erroneous hotlist hits from the Story County Sheriff's Office.<sup>171</sup>

The Marion Police Department and Davenport Police Department claimed their records of unauthorized access were confidential.<sup>172</sup> The Ames Police Department, Davenport Police Department, Newton Police Department, and Marion Police Department claimed their records of erroneous hotlist hits were confidential.<sup>173</sup>

## F. Job Titles Given Access

To try to assess how tightly held and sensitive ALPR information was, the clinic asked for the job titles of people who can access the database. The clinic heard back from 24 agencies that gave us lists of their authorized users' titles.

Each agency that responded provided a different list. To be able to cross-compare, the clinic has grouped personnel titles into three categories. "High ranking officials" refers to the sheriff, the police chief, lieutenants, sergeants, and detectives. "All uniformed officers" refers to non-detective police officers. "Support personnel" includes clerks and any other office staff who have not been formally sworn in as law enforcement personnel.

**Summary Job Titles with Access to ALPR Data**

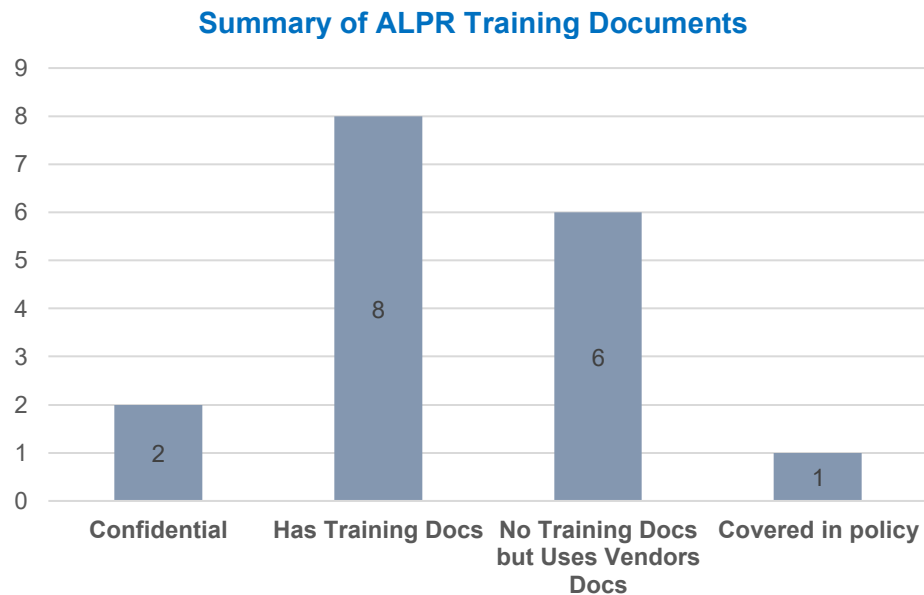
Agency	High Ranking Officials	All Uniformed Officers	Support Personnel
Altoona Police Department	✓	✓	
Ames Police Department	✓	✓	
Bettendorf Police Department	✓	✓	
Black Hawk County Sheriff	✓	✓	
Coralville Police Department	✓		
Dubuque Police Department	✓	✓	✓
Glenwood Police Department	✓	✓	
Indianola Police Department	✓	✓	✓
Iowa City			✓

Agency	High Ranking Officials	All Uniformed Officers	Support Personnel
Johnson County Sheriff	✓	✓	✓
Johnston Police Department	✓	✓	✓
Marion Police Department	✓	✓	
Marshall County Sheriff	✓	✓	✓
Marshalltown Police Department	✓	✓	
Newton Police Department	✓	✓	
North Liberty Police Department	✓	✓	✓
Oelwein Police Department	✓	✓	
Scott County Sheriff	✓	✓	
Storm Lake Police Department	✓	✓	Admin staff can access traffic analytics
Story County Sheriff	✓		
Urbandale Police Department	✓	✓	
Warren County Sheriff	✓	✓	
Waterloo Police Department	✓	✓	✓
Waukeg Police Department	✓	✓	

## G. Training Documents

The clinic received 10 responses to our request for training materials, with 8 disclosing records and 2 claiming the records were confidential.<sup>174</sup> The responses vary—from formal documents that are specific to user training—to referencing the agency’s policy manual that all users must receive training. Some of the manuals walk through how to use the respective software and effectively run searches through the database.

One agency claimed that its training manual was confidential information.<sup>175</sup>



## VI. Unmet Need for Minimum Statewide Protections

A proactive approach to protecting the rights of Iowans in the face of a rapidly expanding ALPR network requires a uniform, statewide approach that creates minimum protections, which localities may then exceed through their own laws and policies. However, even in the absence of state law, local governments choosing to utilize ALPRs should review and amend their ALPR agreements to fully protect their residents.

### A. Comprehensive Statewide Legislation

Responding to a lack of uniformity and minimum standards to proactively safeguard Iowans' civil rights and privacy would require statewide legislation. The records we received show that agencies across the state vary wildly in their handling of ALPR data. A statute could ensure that there is uniform protection wherever Iowans live or travel within the state.

Effective legislation would do the following six things:

#### 1. Mandate all law enforcement agencies create local policies that conform to statewide guidelines.

Such legislation would set minimum requirements for local ALPR policies. It would require that all agencies who use ALPRs—whether they have ALPR devices or just access ALPR data from other places—have an ALPR-specific policy in place which meet these minimum standards or exceed them. Areas of risk that should be covered are:

- Permissible and prohibited uses
- Access restrictions

- Data sharing limitations (which, at the least, should limit data sharing, in the absence of a warrant, to entities within the State of Iowa)
- Data storage limitations (which should not exceed 7 days, unless otherwise required by evidentiary laws and rules)
- Oversight mechanisms

While some local flexibility might be desired in some of these areas, in others, baseline protections could be established through statewide policy setting.

For example, to proactively ensure ALPR adoption will comport with constitutional requirements and protect civil rights, statewide policymaking could require that an officer must have at least reasonable suspicion, and ideally probable cause, prior to searching an ALPR database. That setup matches most ALPR stories that law enforcement touts as successful uses of the tool. A useful exemption to this general rule could permit ALPR database searches when police have partial information about a vehicle from a witness to a crime.<sup>176</sup> By implementing this exemption, individuals' privacy rights would be protected by prohibiting baseless searches of ALPR databases. In addition, when ALPRs are being used to target a specific individual and track their whereabouts, a warrant must be required.

Furthermore, officers should be required to manually confirm that a hotlist hit is accurate prior to any action. Vague and permissive language that encourages such confirmation only "when practicable" is the sort of non-restrictive language that has resulted in people in other states being held at gunpoint due to an ALPR computer error.<sup>177</sup> Requiring manual confirmation in all cases would help protect Iowans from these harmful errors.

## **2. Restrict ALPR database access only to active-duty law enforcement officers.**

A privacy-protective statewide ALPR policy would limit who can access the ALPR data, and how that data can be shared with external agencies. Internally, ALPR data should only be searchable by higher-rank officers. Restricting access to higher-rank officers establishes multiple levels of review and ensures that the search falls within a permissible category.

## **3. Limit the number of agencies receiving ALPR data and increase transparency about which agencies can access records.**

Localities in Iowa should also be required to restrict how ALPR data is shared outside of the agency absent a warrant or court order. Ideally, data should only be shared with agencies within Iowa. Agencies outside of Iowa should not have unfettered access to the data of Iowans.

## **4. Create a uniform statewide retention period unless the data is evidence in an open investigation.**

Iowa must also establish a standard retention period to be implemented statewide. Most agencies default to the standard retention period that their ALPR vendor suggests. For example, Flock has a default retention period of 30 days, which is the maximum allowed

under current state law.<sup>178</sup> However, 30 days is almost always longer than necessary to determine if ALPR data is relevant to an ongoing investigation or prosecution, and ALPR data can be run against hotlists in a matter of seconds. Policies already permit data to be downloaded when it is going to be used as evidence in an investigation, so the 30-day limit applies only to data that has no investigative purpose. Reducing this period to one week or less may significantly improve the privacy of Iowans, while having almost no impact on investigative functions.

## **5. Establish ALPR database oversight mechanisms to prevent improper use.**

Proper ALPR usage requires transparency and oversight; any legislation must have these principles at its core. An efficient and inexpensive option to oversee ALPR database usage is the public. For the public to assist in oversight, any agency who contracts with a vendor that provides ALPR transparency portals must be required to make their transparency portals publicly available. Transparency portals allow the public to review how ALPRs are being used and make information available to the public while anonymizing any sensitive information.<sup>179</sup> Agencies should also be required to make every field within their portals available. For example, not every agency has their search logs available on their portals, however, this information is critical to ensuring ALPRs are not used improperly.

## **6. Require public audits.**

Effective statewide policy would also require public oversight and audits of ALPR databases and searches to ensure local governments are following the state law. Audits should be performed regularly to ensure that ALPRs are being used properly. These audits should include both individual agency audits, and a statewide audit on ALPR use, to review both proper use and local government spending on ALPRs.

## **B. Local Review of Policies and Contracts**

In addition to statewide legislation, local governments can take steps to protect the rights of their residents and abide by principles of good governance.

Such local actions would likely begin with a review of their ALPR vendor agreements, initiating amendments where appropriate, and to proactively share information with the community about data ownership and sharing. This type of information can simply be posted on agency websites.

In Iowa, most agencies have standardized contracts with their ALPR vendor.<sup>180</sup> Local governments in other states have included language in their agreements to state that the ALPR vendor does not own and shall not sell, share, or otherwise provide access to Customer Generated Data.<sup>181</sup> While law enforcement and ALPR vendors heavily reference that the ALPR vendor does not own the data, the contracts can be unclear on this issue.<sup>182</sup> A minor change to the language of the agreement can provide actionable protection if the data was mishandled by the ALPR vendor.



## VII. Conclusion

The current lack of state regulations on ALPRs, especially around ALPR data retention and sharing, puts Iowans at risk. Iowans are being surveilled without their knowledge every day through ALPR data collection. The people of Iowa, and the United States, are entitled to certain rights: to be free to move without being surveilled, to associate where and with whom they choose, and be to free from unreasonable searches. If ALPRs are unregulated, these rights are just empty promises.

The clinic's findings show that ALPR use across the state of Iowa is only growing more prevalent, but our state laws have not progressed with technological advances. To uphold Iowans' rights and prevent unreasonable government intrusion into their lives from ALPR use, timely, proactive statewide protections are needed.

## Appendix A: Records Request Template

[Date]

[Agency Name]

[Agency Address]

[Agency Address]

***Re: Public records request regarding automated license plate readers***

Dear [Name of Records Supervisor]:

We are students in the Technology Law Clinic at the University of Iowa College of Law. Under the Iowa Open Records Statute, Iowa Code ch. 22, we are requesting copies of the following public records regarding automated license plate readers (“ALPRs”):

1. Vendor contracts
2. Memoranda of understanding
3. Invoices
4. Policies regarding ALPR use, access, data retention, and/or data sharing, including but not limited to policies related to ALPR and:
  - a. Immigration enforcement;
  - b. Traffic enforcement;
  - c. Permissible and prohibited uses;
  - d. Data retention; and
  - e. Data access or sharing internal and external to the agency.
5. ALPR camera inventory lists
6. ALPR database search logs
7. ALPR database audit reports or trails
8. ALPR database transparency portal access
9. Records of erroneous ALPR hotlist hits<sup>†</sup>
10. Job titles of personnel with access to the ALPR database
11. Records of unauthorized access to the ALPR database
12. ALPR user manuals, training materials, and similar documents used to educate users of ALPRs and the related data systems.

We request a waiver of all fees because the disclosure of the requested information is in the public interest and will contribute significantly to the public’s understanding of ALPRs’ use in the state of Iowa. Additionally, we are students operating within a legal clinic and this

---

<sup>†</sup> “Hotlist hits” refers to lists of known license plates or vehicles of interest that trigger real-time alerts to officers when a match is detected. Typically, stolen vehicles or vehicles associated with unlawful activities make up these lists.

information is relevant for research we are doing as part of our coursework. This information is not being sought for commercial purposes.

If our waiver request is denied, please inform us prior to fulfilling the request and provide an itemized estimate of reasonable costs, so that we may discuss alternative and more cost-efficient methods to comply with this request.

The Iowa Open Records Statute requires a response time within ten to twenty business days. If access to the records we are requesting will take longer than that, please contact us with information about when we might expect copies or the ability to inspect the requested records.

If you deny any or all of this request, please cite each specific exemption you feel justifies the refusal to release the information and notify us of the appeal procedures available to me under the law.

We ask that any questions, responses, or records produced from this request be directed to this email: [law-legal-clinic@uiowa.edu](mailto:law-legal-clinic@uiowa.edu).

Thank you for considering this request.

Sincerely,

[Student Names]

[law-legal-clinic@uiowa.edu](mailto:law-legal-clinic@uiowa.edu)

319-335-9023

University of Iowa College of Law

Technology Law Clinic

## Appendix B: Complete List of Agencies Surveyed in this Report

Below is a list of the 48 Iowa law enforcement agencies that were surveyed as part of this report. They are not all the agencies that have ALPRs in Iowa, and were chosen to get a variety of locations, sizes, and type of law enforcement.

The Clinton Police Department, Des Moines Police Department, Fayette County Sheriff's Office, Fremont County Sheriff's Office, and Mills County Sheriff's Office did not respond to the request before publication.

An overview of their responses can be found in Appendix. Copies of the records received can be found [here](#).

- |                                      |   |
|--------------------------------------|---|
| 1) Adams County Sheriff              | 26) Iowa Department of Public Safety/Division of Criminal Investigation         |
| 2) Altoona Police Department         | 27) Iowa Department of Public Safety/Division of Intelligence and Fusion Center |
| 3) Ames Police Department            | 28) Iowa Department of Public Safety/Iowa State Patrol                          |
| 4) Ankeny Police Department          | 29) Johnson County Sheriff  |
| 5) Appanoose County Sheriff          | 30) Johnston Police Department  |
| 6) Bettendorf Police Department      | 31) Linn County Sheriff   |
| 7) Black Hawk County Sheriff         | 32) Marion Police Department  |
| 8) Cedar County Sheriff's Office     | 33) Marshall County Sheriff   |
| 9) Cedar Falls Police Department     | 34) Marshalltown Police Department  |
| 10) Cedar Rapids Police Department   | 35) Mills County Sheriff  |
| 11) Centerville Police Department    | 36) Newton Police Department  |
| 12) Clinton County Sheriff           | 37) North Liberty Police Department   |
| 13) Clinton Police Department        | 38) Oelwein Police Department   |
| 14) Clive Police Department          | 39) Polk County Sheriff   |
| 15) Coralville Police Department     | 40) Pottawattamie County Sheriff  |
| 16) Council Bluffs Police Department | 41) Scott County Sheriff  |
| 17) Davenport Police Department      | 42) Storm Lake Police Department  |
| 18) Des Moines Police Department     | 43) Story County Sheriff  |
| 19) Dubuque County Sheriff           | 44) Urbandale Police Department   |
| 20) Dubuque Police Department        | 45) Warren County Sheriff   |
| 21) Fayette County Sheriff           | 46) Waterloo Police Department  |
| 22) Fremont County Sheriff           | 47) Waukee Police Department  |
| 23) Glenwood Police Department       | 48) West Des Moines Police Department   |
| 24) Indianola Police Department      |   |
| 25) Iowa City Police Department      |   |

## Appendix C: Records Obtained from Agencies

### Explanation of Terms

- **Records Obtained:** Records or information responsive to this portion of the request were received, or were independently obtained by the clinic
- **No Records:** The agency did not have any records responsive to this request
- **Confidential:** The agency had records but believes they are confidential, so it did not disclose them
- **No Records and Would Be Confidential:** The agency did not have any records responsive to the request but stated that if they did, they would be confidential and not disclose them
- **No ALPRs:** The agency did not use ALPRs at the time of the request and therefore had no records
- **No Response:** The agency did not respond
- **Found Online:** Clinic found information through independent research

Agency	Contracts	MOUs	Invoices	Policies	Camera Lists	Search Logs	Audit Reports	Transparency Portals	Erroneous Hotlist Hits	Job Titles with Access	Unauthorized Access	Training Documents
Adams County Sheriff	No ALPRs											
Altoona Police Department	Records Obtained	Records Obtained	Records Obtained	Records Obtained	No Records and Would Be Confidential / Found Online	No Records	No Records	Records Obtained	No Records	Records Obtained	No Records	Records Obtained
Ames Police Department	Records Obtained	No Records	Records Obtained	No Records	Records Obtained	Confidential	No Records	No Records	Confidential	Records Obtained	No Records	No Records
Ankeny Police Department	Records Obtained	No Records	Records Obtained	Records Obtained	No Records	No Records	No Records	No Records	No Records	No Records	No Records	No Records
Appanoose County Sheriff	No ALPRs											
Bettendorf Police Department	Records Obtained	No Records	Records Obtained	Records Obtained	Confidential	Confidential	Confidential	No Records	No Records and Would Be Confidential	Records Obtained	No Records	No Records
Black Hawk County Sheriff	Records Obtained	No Records	Records Obtained	Records Obtained	No Records	No Records	No Records	No Records	No Records	Records Obtained	No Records	Records Obtained

Agency	Contracts	MOUs	Invoices	Policies	Camera Lists	Search Logs	Audit Reports	Transparency Portals	Erroneous Hotlist Hits	Job Titles with Access	Unauthorized Access	Training Documents
Cedar County Sheriff	Currently has no ALPRs but told the clinic they plan to start using ALPRs in early 2026											
Cedar Falls Police Department	No ALPRs											
Cedar Rapids Police Department	Records Obtained	No Records	No Records	Records Obtained	Records Obtained	No Records	Records Obtained	Records Obtained	No Records	No Records	No Records	No Records
Centerville Police Department	No ALPRs											
Clinton County Sheriff	Records Obtained	No Records	Records Obtained	No Records	Records Obtained	No Records	No Records	No Records	No Records	No Records	No Records	No Records
Clinton Police Department	No Response (as of publication)			Found Online	Found Online	Found Online	No Response (as of publication)	Found Online	No Response (as of publication)			
Clive Police Department	Records Obtained	Records Obtained	Records Obtained	Records Obtained	Records Obtained	Confidential / Found Online	Records Obtained	No Records / Found Online	No Records and Would Be Confidential	No Records	No Records	No Records
Coralville Police Department	Records Obtained	No Records	No Records	Records Obtained	Records Obtained	Records Obtained	No Records	Records Obtained	No Records	Records Obtained	No Records	No Records
Council Bluffs Police Department	Records Obtained	No Records	Records Obtained	Records Obtained	Records Obtained	Records Obtained	No Records	Records Obtained	No Records	No Records	No Records	No Records
Davenport Police Department	Confidential	Confidential	Records Obtained	Records Obtained	Confidential / Found Online	Confidential / Found Online	Confidential	Confidential / Found Online	Confidential	Confidential	Confidential	Confidential
Des Moines Police Department	No Response (as of publication)											
Dubuque County Sheriff	No ALPRs											
Dubuque Police Department	Records Obtained	No Records	Records Obtained	Records Obtained	Records Obtained	Records Obtained	Records Obtained	Records Obtained	No Records	Records Obtained	No Records	No Records
Fayette County Sheriff	No Response (as of publication)											
Fremont County Sheriff	No Response (as of publication)		Records Obtained	No Response (as of publication)								
Glenwood Police Department	No Records	No Records	Records Obtained	Records Obtained	Records Obtained	No Records	No Records	No Records	No Records	Records Obtained	No Records	No Records
Indianola Police Department	No Records	No Records	Records Obtained	Records Obtained	Records Obtained	Records Obtained	No Records	Records Obtained	No Records	Records Obtained	No Records	Records Obtained
Iowa City Police Department	No Records	No Records	Records Obtained	No Records	Records Obtained	No Records	No Records	No Records	No Records	Records Obtained	No Records	Records Obtained
Iowa Department of Public Safety	Records Obtained	Records Obtained	Records Obtained	No Records	No Records	No Records	No Records	No Records	No Records	No Records	No Records	No Records

Agency	Contracts	MOUs	Invoices	Policies	Camera Lists	Search Logs	Audit Reports	Transparency Portals	Erroneous Hotlist Hits	Job Titles with Access	Unauthorized Access	Training Documents
Johnson County Sheriff	No Records	Records Obtained	No Records	Records Obtained	No Records	Confidential	Confidential	No Records	No Records	Records Obtained	No Records	No Records
Johnston Police Department	Records Obtained	Records Obtained	Records Obtained	Records Obtained	Records Obtained	No Records	No Records	Records Obtained	No Records	Records Obtained	No Records	No Records
Linn County Sheriff	No Records	No Records	No Records	Records Obtained	No Records	No Records	No Records	No Records	No Records	No Records	No Records	No Records
Marion Police Department	Records Obtained	No Records	Records Obtained	Records Obtained	Records Obtained	Confidential	Confidential	Records Obtained	Confidential	Records Obtained	Confidential	No Records
Marshall County Sheriff	Records Obtained	No Records	Records Obtained	Records Obtained	Records Obtained	Records Obtained	No Records	No Records	No Records	Records Obtained	No Records	Records Obtained
Marshalltown Police Department	Records Obtained	No Records	Records Obtained	Records Obtained	No Records	No Records	No Records	No Records	No Records	Records Obtained	No Records	Records Obtained
Mills County Sheriff	Unable to complete our request due to staffing issues											
Newton Police Department	Records Obtained	No Records	Records Obtained	Records Obtained	No Records	Confidential	Confidential	No Records	Confidential	Records Obtained	No Records	Confidential
North Liberty Police Department	Records Obtained	No Records	Records Obtained	Records Obtained	Records Obtained	Records Obtained	Confidential	Records Obtained	No Records	Records Obtained	No Records	No Records
Oelwein Police Department	Records Obtained	No Records	Records Obtained	Records Obtained	Confidential	Confidential	Confidential	Confidential	No Records	Records Obtained	No Records	No Records
Polk County Sheriff	No Records	No Records	No Records	No Records	No Records	No Records	No Records	No Records	No Records	No Records	No Records	No Records
Pottawattamie County Sheriff	Records Obtained	No Records	Records Obtained	Records Obtained	No Records	No Records	No Records	No Records	No Records	No Records	No Records	No Records
Scott County Sheriff	No Records	Records Obtained	Records Obtained	Records Obtained	Records Obtained	Records Obtained	Records Obtained	No Records	No Records	Records Obtained	No Records	Records Obtained
Storm Lake Police Department	No Records	No Records	Records Obtained	Records Obtained	Records Obtained	No Records	Confidential	Records Obtained	No Records	Records Obtained	No Records	No Records
Story County Sheriff	No Records	No Records	Records Obtained	No Records	Records Obtained	Records Obtained	No Records	Records Obtained	Records Obtained	Records Obtained	No Records	No Records
Urbandale Police Department	Records Obtained	No Records	Records Obtained	Records Obtained	Records Obtained	Confidential	Confidential	No Records / Found Online	No Records	Records Obtained	No Records	Records Obtained
Warren County Sheriff	Records Obtained	No Records	Records Obtained	Records Obtained	Records Obtained	Records Obtained	No Records	No Records	No Records	Records Obtained	No Records	No Records
Waterloo Police Department	Records Obtained	No Records	No Records	Records Obtained	No Records	No Records	No Records	No Records	No Records	Records Obtained	No Records	No Records
Waukee Police Department	Records Obtained	No Records	Records Obtained	Records Obtained	No Records and Would Be Confidential	Confidential	Confidential	No Records	No Records and Would Be Confidential	Records Obtained	No Records and Would Be Confidential	No Records



Agency	Contracts	MOUs	Invoices	Policies	Camera Lists	Search Logs	Audit Reports	Transparency Portals	Erroneous Hotlist Hits	Job Titles with Access	Unauthorized Access	Training Documents
West Des Moines Police Department	Records Obtained	No Records	No Records	Records Obtained	Records Obtained	Records Obtained	No Records	Records Obtained	No Records	No Records	No Records	No Records

## Appendix D: Iowa Agencies Known to Access Flock ALPR Database

Flock is the largest vendor of ALPRs in Iowa. Law enforcement agencies and others can contract with Flock to put up ALPRs in their locale *or* they can simply pay to get access to the database and not put up any ALPRs in their area.

Our research found that other agencies, not part of this study, were accessing Flock data. They are listed below, current as of Nov. 21, 2025.

There is an asterisk (\*) next to the communities included that our research confirmed have their own ALPRs. **Agencies without an asterisk may or may not have ALPRs.**

- |  |   |
|--|---|
| 1. Altoona Police Department*          | 24. Glenwood Police Department*             |
| 2. Ankeny Police Department*           | 25. Greene County Sheriff's Office          |
| 3. Arnolds Park Police Department      | 26. Indianola Police Department*            |
| 4. Bettendorf Police Department*       | 27. Iowa Department of Corrections          |
| 5. Burlington Police Department*       | 28. Iowa Department of Public Safety*       |
| 6. Camanche Police Department          | 29. Iowa State University Police Department |
| 7. Carlisle Police Department*         | 30. Jasper County Sheriff's Office          |
| 8. Carter Lake Police Department       | 31. Johnson County Sheriff's Office*        |
| 9. Cedar County Sheriff's Office       | 32. Johnston Police Department*             |
| 10. Cedar Rapids Police Department*    | 33. Le Mars Police Department               |
| 11. Clarke County Sheriff's Office     | 34. Linn County Sheriff's Office            |
| 12. Clear Lake Police Department       | 35. Mar Mac Police Department               |
| 13. Clinton Police Department*         | 36. Marcus Police Department                |
| 14. Clive Police Department*           | 37. Marshall County Sheriff's Office*       |
| 15. Coralville Police Department*      | 38. Marshalltown Police Department*         |
| 16. Council Bluffs Police Department*  | 39. Newton Police Department*               |
| 17. Davenport Police Department*       | 40. North Liberty Police Department*        |
| 18. Des Moines County Sheriff's Office | 41. Norwalk Police Department               |
| 19. DeWitt Police Department           | 42. Oelwein Police Department*              |
| 20. Dubuque Police Department*         | 43. Osceola Police Department               |
| 21. Earlham Police Department          | 44. Pleasant Hill Police Department         |
| 22. Eldridge Police Department         | 45. Polk City Police Department             |
| 23. Fremont County Sheriff's Office    |   |

- |  |   |
|--|---|
| 46. Polk County Conservation*              | 55. University of Iowa Police Department* |
| 47. Pottawattamie County Sheriff's Office* | 56. Wapello County Sheriff's Office       |
| 48. Scott County Sheriff's Office*         | 57. Warren County Sheriff's Office*       |
| 49. Sergeant Bluff Police Department       | 58. Washington Police Department          |
| 50. Sioux City Police Department           | 59. Waukeke Police Department*            |
| 51. Storm Lake Police Department*          | 60. Waukon Police Department              |
| 52. Story County Sheriff's Office*         | 61. West Des Moines Police Department*    |
| 53. Tipton Police Department               | 62. Woodbury County Sheriff's Office      |
| 54. Urbandale Police Department*           |   |

## Endnotes

- 
- <sup>1</sup> David J. Roberts & Meghann Casanova, *Automated License Plate Recognition (ALPR) Use by Law Enforcement: Policy and Operational Guide, Summary 2* (2012), <https://www.ojp.gov/pdffiles1/nij/grants/239605.pdf> [<https://perma.cc/ST44-BKBP>].
- <sup>2</sup> *Stop Crime in Its Tracks with Evidence that Drives Action*, Flock Safety, <https://www.flocksafety.com/products/license-plate-readers> [<https://perma.cc/KP6Q-YVFG>] (last visited Nov. 3, 2025).
- <sup>3</sup> *The ELSAG Mobile Plate Hunter: Smaller, Faster and Smarter than Ever Before*, Leonardo, <https://www.leonardocompany-us.com/lpr/elsag-mobile> [<https://perma.cc/RM87-77AJ>] (last visited Nov. 3, 2025).
- <sup>4</sup> *ELSAG ALPR Radar Trailers and Message Boards: Discretely Monitor High-Risk Areas*, Leonardo, <https://www.leonardocompany-us.com/lpr/elsag-radar-trailers> [<https://perma.cc/K8G7-5MZS>] (last visited Nov. 3, 2025).
- <sup>5</sup> *ELSAG ALPR Radar Trailers and Message Boards: Discretely Monitor High-Risk Areas*, Leonardo, <https://www.leonardocompany-us.com/lpr/elsag-radar-trailers> [<https://perma.cc/K8G7-5MZS>] (last visited Nov. 3, 2025).
- <sup>6</sup> *ELSAG ALPR Radar Trailers and Message Boards: Discretely Monitor High-Risk Areas*, Leonardo, <https://www.leonardocompany-us.com/lpr/elsag-radar-trailers> [<https://perma.cc/K8G7-5MZS>] (last visited Nov. 3, 2025).
- <sup>7</sup> David J. Roberts & Meghann Casanova, *Automated License Plate Recognition (ALPR) Use by Law Enforcement: Policy and Operational Guide, Summary 2* (2012), <https://www.ojp.gov/pdffiles1/nij/grants/239605.pdf> [<https://perma.cc/ST44-BKBP>]; Lauren Fichten & Alex Clark, *When License Plate Readers Get it Wrong*, CBS News (July 24, 2025), <https://www.cbsnews.com/news/license-plate-readers-alpr-mistakes> [<https://perma.cc/DFW8-C8DX>].
- <sup>8</sup> Nat'l Ass'n of Crim. Def. Laws., *ALPR Primer 1* (2023), <https://www.nacdl.org/getattachment/49944c94-b295-475e-b575-36bda695286f/alprprimer.pdf> [<https://perma.cc/39GU-PXL5>].
- <sup>9</sup> U.S. Dep't of Homeland Sec., *Automated License Plate Readers: Market Survey Report 51–52* (2025), [https://www.dhs.gov/sites/default/files/2025-06/25\\_0606\\_st\\_lprmsr.pdf](https://www.dhs.gov/sites/default/files/2025-06/25_0606_st_lprmsr.pdf) [<https://perma.cc/GTM4-H6BY>].
- <sup>10</sup> While the users must be authorized this does not prevent unauthorized users from requesting searches to be run by the authorized users. This has allowed unauthorized individuals to run searches through ALPR databases. *See, e.g.*, Jason Koebler & Joseph Cox, *Ice Taps into Nationwide AI-Enabled Camera Network, Data Shows*, 404 Media (May 27, 2025, 9:35 AM), <https://www.404media.co/ice-taps-into-nationwide-ai-enabled-camera-network-data-shows/> [<https://perma.cc/JP6Z-QYXL>] (discussing ICE requesting local police conduct ALPR searches because ICE does not have a contract with Flock).
- <sup>11</sup> Peter G. Berris, Kristin Finklea & Dave S. Sidhu, Cong. Rsch. Serv., IF13068, *Automated License Plate Readers: Background and Legal Issues 1* (2025), [https://www.congress.gov/crs\\_external\\_products/IF/PDF/IF13068/IF13068.1.pdf](https://www.congress.gov/crs_external_products/IF/PDF/IF13068/IF13068.1.pdf) [<https://perma.cc/LK9D-W5RL>].
- <sup>12</sup> Peter G. Berris, Kristin Finklea & Dave S. Sidhu, Cong. Rsch. Serv., IF13068, *Automated License Plate Readers: Background and Legal Issues 1* (2025),

---

[https://www.congress.gov/crs\\_external\\_products/IF/PDF/IF13068/IF13068.1.pdf](https://www.congress.gov/crs_external_products/IF/PDF/IF13068/IF13068.1.pdf)  
[<https://perma.cc/LK9D-W5RL>].

<sup>13</sup> Peter G. Berris, Kristin Finklea & Dave S. Sidhu, Cong. Rsch. Serv., IF13068, Automated License Plate Readers: Background and Legal Issues 1 (2025),  
[https://www.congress.gov/crs\\_external\\_products/IF/PDF/IF13068/IF13068.1.pdf](https://www.congress.gov/crs_external_products/IF/PDF/IF13068/IF13068.1.pdf)  
[<https://perma.cc/LK9D-W5RL>].

<sup>14</sup> *Stop Crime in Its Tracks with Evidence that Drives Action*, Flock Safety,  
<https://www.flocksafety.com/products/license-plate-readers> [<https://perma.cc/9BMC-9DEP>] (last visited Nov. 3, 2025); *License Plate Reader Policy*, Flock Safety (Oct. 30, 2025),  
<https://www.flocksafety.com/legal/lpr-policy> [<https://perma.cc/Q46T-ZU88>].

<sup>15</sup> *Search Once. See Everything.*, Flock Safety, <https://www.flocksafety.com/products/flock-nova>  
[<https://perma.cc/TNM6-8JFM>] (last visited Nov. 3, 2025).

<sup>16</sup> *Type What You Know. Find What You Need.*, Flock Safety,  
<https://www.flocksafety.com/products/flock-freeform> [<https://perma.cc/8B2F-JWSV>] (last visited Nov. 3, 2025).

<sup>17</sup> *Real-Time Vehicle Leads, Nationwide*, Flock Safety,  
<https://www.flocksafety.com/products/national-lpr-network> [<https://perma.cc/M87U-YU78>] (last visited Nov. 3, 2025).

<sup>18</sup> Joseph Cox, *ICE, Secret Service, Navy All Had Access to Flocks Nationwide Network of Cameras*, 404 Media (Oct. 16, 2025, 9:00 AM), <https://www.404media.co/ice-secret-service-navy-all-had-access-to-flocks-nationwide-network-of-cameras> [<https://perma.cc/XZ7Y-XSM7>].

<sup>19</sup> Jason Koebler, *Home Depot and Lowe's Share Data From Hundreds of AI Cameras with Cops*, 404 Media (Aug. 6, 2025, 11:18 AM), <https://www.404media.co/home-depot-and-lowes-share-data-from-hundreds-of-ai-cameras-with-cops> [<https://perma.cc/2FTH-SC83>].

<sup>20</sup> Letter from Ron Wyden, U.S. Sen. of Oregon, to Garrett Langley, Chief Exec. Officer, Flock Safety (Oct. 16, 2025), [https://www.wyden.senate.gov/imo/media/doc/wyden\\_letter\\_to\\_flock.pdf](https://www.wyden.senate.gov/imo/media/doc/wyden_letter_to_flock.pdf)  
[<https://perma.cc/BG3N-CPLE>].

<sup>21</sup> See Jay Stanley, *Flock Can Share Driver-Surveillance Data Even When Police Departments Opt out, and Other Flock Developments*, ACLU (Oct. 24, 2025), <https://www.aclu.org/news/privacy-technology/flock-massachusetts-and-updates> [<https://perma.cc/T292-RRDT>]; Contract between the Clive Police Department and Flock Safety (Dec. 12, 2022) [[link](#)].

<sup>22</sup> See *Data Driven: What is ALPR?*, Elec. Frontier Found., <https://www.eff.org/pages/what-alpr>  
[<https://perma.cc/H7Z9-2ALX>] (last visited Nov. 3, 2025).

<sup>23</sup> *Stop Crime in Its Tracks with Evidence that Drives Action*, Flock Safety,  
<https://www.flocksafety.com/products/license-plate-readers> [<https://perma.cc/X7C7-P9BQ>] (last visited Nov. 3, 2025).

<sup>24</sup> See Gwen Hope, *AI Mass Surveillance Expands, Iowa Cities Resist Transparency*, Bleeding Heartland (July 17, 2025), <https://www.bleedingheartland.com/2025/07/17/surveillance-ai-alpr-flock-transparency> [<https://perma.cc/29J8-JFX6>].

<sup>25</sup> See Appendix D to this report.

<sup>26</sup> See *Data Driven: What is ALPR?*, Elec. Frontier Found., <https://www.eff.org/pages/what-alpr>  
[<https://perma.cc/H7Z9-2ALX>] (last visited Nov. 3, 2025).

- 
- <sup>27</sup> See Lauren Fichten & Alex Clark, *When License Plate Readers Get it Wrong*, CBS News (July 24, 2025), <https://www.cbsnews.com/news/license-plate-readers-alpr-mistakes> [<https://perma.cc/DFW8-C8DX>].
- <sup>28</sup> Joshua Sabatini, *City Set to Approve Wrongful Arrest Suit Settlement*, San Francisco Examiner (Sept. 7, 2015), [https://www.sfexaminer.com/news/city-set-to-approve-wrongful-arrest-suit-settlement/article\\_2606ea3a-bd84-56b1-be3f-e6d608c397ca.html](https://www.sfexaminer.com/news/city-set-to-approve-wrongful-arrest-suit-settlement/article_2606ea3a-bd84-56b1-be3f-e6d608c397ca.html) [<https://perma.cc/B7Z4-66YS>]; Adam Schwartz, *The Human Toll of ALPR Errors*, Elec. Frontier Found. (Nov. 1, 2024), <https://www.eff.org/deeplinks/2024/11/human-toll-alpr-errors> [<https://perma.cc/9YG7-U7SW>].
- <sup>29</sup> Joshua Sabatini, *City Set to Approve Wrongful Arrest Suit Settlement*, S.F. Exam'r (Sept. 7, 2015), [https://www.sfexaminer.com/news/city-set-to-approve-wrongful-arrest-suit-settlement/article\\_2606ea3a-bd84-56b1-be3f-e6d608c397ca.html](https://www.sfexaminer.com/news/city-set-to-approve-wrongful-arrest-suit-settlement/article_2606ea3a-bd84-56b1-be3f-e6d608c397ca.html) [<https://perma.cc/B7Z4-66YS>].
- <sup>30</sup> Adam Schwartz, *The Human Toll of ALPR Errors*, Elec. Frontier Found. (Nov. 1, 2024), <https://www.eff.org/deeplinks/2024/11/human-toll-alpr-errors> [<https://perma.cc/9YG7-U7SW>].
- <sup>31</sup> Lisa Fernandez, *Sheriff Pays East Bay Privacy Advocate Nearly \$50K in License Plate Reader Case*, KTVU Fox 2 (Nov. 16, 2020, 8:47 AM), <https://www.ktvu.com/news/sheriff-pays-east-bay-privacy-advocate-nearly-50k-in-license-plate-reader-case> [<https://perma.cc/WA3M-T5ZR>]; Lauren Fichten & Alex Clark, *When License Plate Readers Get it Wrong*, CBS News (July 24, 2025), <https://www.cbsnews.com/news/license-plate-readers-alpr-mistakes> [<https://perma.cc/DFW8-C8DX>]; Adam Schwartz, *The Human Toll of ALPR Errors*, Elec. Frontier Found. (Nov. 1, 2024), <https://www.eff.org/deeplinks/2024/11/human-toll-alpr-errors> [<https://perma.cc/9YG7-U7SW>].
- <sup>32</sup> Lisa Fernandez, *Sheriff Pays East Bay Privacy Advocate Nearly \$50K in License Plate Reader Case*, KTVU Fox 2 (Nov. 16, 2020, 8:47 AM), <https://www.ktvu.com/news/sheriff-pays-east-bay-privacy-advocate-nearly-50k-in-license-plate-reader-case> [<https://perma.cc/WA3M-T5ZR>].
- <sup>33</sup> Jennifer Yoshikoshi, *Atherton Officer Involved in the Arrest of M-A Student Also Named in Lawsuit over 'Unreasonable Seizure' and Use of 'Excessive Force,' Almanac* (Feb. 16, 2024, 5:18 PM), <https://www.almanacnews.com/police/2024/02/12/atherton-officer-involved-in-the-arrest-of-m-a-student-also-named-in-lawsuit-over-unreasonable-seizure-and-use-of-excessive-force> [<https://perma.cc/8U4C-M6KA>]; Adam Schwartz, *The Human Toll of ALPR Errors*, Elec. Frontier Found. (Nov. 1, 2024), <https://www.eff.org/deeplinks/2024/11/human-toll-alpr-errors> [<https://perma.cc/9YG7-U7SW>].
- <sup>34</sup> Adam Schwartz, *The Human Toll of ALPR Errors*, Elec. Frontier Found. (Nov. 1, 2024), <https://www.eff.org/deeplinks/2024/11/human-toll-alpr-errors> [<https://perma.cc/9YG7-U7SW>].
- <sup>35</sup> Associated Press, *City Agrees \$1.9M Settlement with Black Family Held at Gunpoint by Police*, Guardian (Feb. 6, 2024, 7:59 AM), <https://www.theguardian.com/us-news/2024/feb/06/aurora-settlement-black-family-held-gunpoint-police> [<https://perma.cc/M4XL-MNM4>]; Adam Schwartz, *The Human Toll of ALPR Errors*, Elec. Frontier Found. (Nov. 1, 2024), <https://www.eff.org/deeplinks/2024/11/human-toll-alpr-errors> [<https://perma.cc/9YG7-U7SW>].
- <sup>36</sup> Associated Press, *City Agrees \$1.9M Settlement with Black Family Held at Gunpoint by Police*, Guardian (Feb. 6, 2024, 7:59 AM), <https://www.theguardian.com/us-news/2024/feb/06/aurora-settlement-black-family-held-gunpoint-police> [<https://perma.cc/M4XL-MNM4>].
- <sup>37</sup> Adam Schwartz, *The Human Toll of ALPR Errors*, Elec. Frontier Found. (Nov. 1, 2024), <https://www.eff.org/deeplinks/2024/11/human-toll-alpr-errors> [<https://perma.cc/9YG7-U7SW>].
- <sup>38</sup> Phaedra Haywood, *Sisters Sue Española Over Traffic Stop They Say Was Illegal*, Santa Fe New Mexican (Feb. 12, 2025), [https://www.santafenewmexican.com/news/local\\_news/sisters-sue-espa-ola-over-traffic-stop-they-say-was-illegal/article\\_1c949c30-ae3e-11ee-ad85-f71a8c9ecb1e.html](https://www.santafenewmexican.com/news/local_news/sisters-sue-espa-ola-over-traffic-stop-they-say-was-illegal/article_1c949c30-ae3e-11ee-ad85-f71a8c9ecb1e.html) [<https://perma.cc/W6C8-PNBE>]; Adam Schwartz, *The Human Toll of ALPR Errors*, Elec. Frontier



---

Found. (Nov. 1, 2024), <https://www.eff.org/deeplinks/2024/11/human-toll-alpr-errors> [<https://perma.cc/9YG7-U7SW>].

<sup>39</sup> Karen Morfitt, *Flock Cameras Lead Colorado Police to Wrong Suspect: “It Became My Job to Prove My Innocence,”* CBS News (Nov. 13, 2025, 7:28 PM), <https://www.cbsnews.com/colorado/news/flock-cameras-lead-colorado-police-wrong-suspect> [<https://perma.cc/RSZ8-GSC4>].

<sup>40</sup> Patrick McCarthy, *A Study Found Syracuse’s New License Plate Readers Make Frequent Mistakes. Councilors Didn’t Know Before Approving Them*, Central Current (Aug. 13, 2024), <https://centralcurrent.org/a-study-found-syracuses-new-license-plate-readers-make-frequent-mistakes-councilors-didnt-know-before-approving-them> [<https://perma.cc/ZWU9-FWBP>].

<sup>41</sup> *Real-Time Vehicle Leads, Nationwide*, Flock Safety, <https://www.flocksafety.com/products/national-lpr-network> [<https://perma.cc/M87U-YU78>] (last visited Nov. 3, 2025).

<sup>42</sup> Jason Koebler & Joseph Cox, *ICE Taps into Nationwide AI-Enabled Camera Network, Data Shows*, 404 Media (May 27, 2025, 9:36 AM), <https://www.404media.co/ice-taps-into-nationwide-ai-enabled-camera-network-data-shows> [<https://perma.cc/B4YF-99UY>]; Byron Tau & Garance Burke, *Border Patrol is Monitoring US Drivers and Detaining Those With ‘Suspicious’ Travel Patterns*, AP (Nov. 20, 2025, 3:27 PM), <https://apnews.com/article/immigration-border-patrol-surveillance-drivers-ice-trump-9f5d05469ce8c629d6fecf32d32098cd> [<https://perma.cc/V3T2-RPGX>].

<sup>43</sup> Michael Stavola, *Kansas Police Chief Used Flock License Plate Cameras 164 Times to Track Ex-Girlfriend*, Wichita Eagle (Aug. 17, 2024, 12:30 PM), <https://www.kansas.com/news/politics-government/article291059560.html> [<https://perma.cc/CWF6-656R>].

<sup>44</sup> Michael Stavola, *Kansas Police Chief Used Flock License Plate Cameras 164 Times to Track Ex-Girlfriend*, Wichita Eagle (Aug. 17, 2024, 12:30 PM), <https://www.kansas.com/news/politics-government/article291059560.html> [<https://perma.cc/CWF6-656R>].

<sup>45</sup> Michael Stavola, *Kansas Police Chief Used Flock License Plate Cameras 164 Times to Track Ex-Girlfriend*, Wichita Eagle (Aug. 17, 2024, 12:30 PM), <https://www.kansas.com/news/politics-government/article291059560.html> [<https://perma.cc/CWF6-656R>].

<sup>46</sup> Rindala Alajaji & Dave Maass, *License Plate Surveillance Logs Reveal Racist Policing Against Romani People*, Elec. Frontier Found. (Nov. 3, 2025), <https://www.eff.org/deeplinks/2025/11/license-plate-surveillance-logs-reveal-racist-policing-against-romani-people> [<https://perma.cc/UG55-X6UE>].

<sup>47</sup> See Joseph Cox & Jason Koebler, *A Texas Cop Searched License Plate Cameras Nationwide for a Woman Who Got an Abortion*, 404 Media (May 29, 2025), <https://www.404media.co/a-texas-cop-searched-license-plate-cameras-nationwide-for-a-woman-who-got-an-abortion/> [<https://perma.cc/SPB4-7FVS>]; see also Dave Maas & Rindala Alajaji, *Flock Safety and Texas Sheriff Claimed License Plate Search Was for a Missing Person. It Was an Abortion Investigation.*, Elec. Frontier Found. (Oct. 7, 2025), <https://www.eff.org/deeplinks/2025/10/flock-safety-and-texas-sheriff-claimed-license-plate-search-was-missing-person-it> [<https://perma.cc/V8ML-AVGD>].

<sup>48</sup> See Dave Maas & Rindala Alajaji, *Flock Safety and Texas Sheriff Claimed License Plate Search Was for a Missing Person. It Was an Abortion Investigation.*, Elec. Frontier Found. (Oct. 7, 2025), <https://www.eff.org/deeplinks/2025/10/flock-safety-and-texas-sheriff-claimed-license-plate-search-was-missing-person-it> [<https://perma.cc/V8ML-AVGD>].

<sup>49</sup> Isiah Holmes, *Analysis of Flock Use by Wisconsin Cops Reveals Trends, Raises Questions*, News From The States (Aug. 6, 2025), <https://www.newsfromthestates.com/article/analysis-flock-use-wisconsin-cops-reveals-trends-raises-questions> [<https://perma.cc/N9YW-2D7D>].



- 
- <sup>50</sup> Isiah Holmes, *Analysis of Flock Use by Wisconsin Cops Reveals Trends, Raises Questions*, News From The States (Aug. 6, 2025), <https://www.newsfromthestates.com/article/analysis-flock-use-wisconsin-cops-reveals-trends-raises-questions> [<https://perma.cc/N9YW-2D7D>].
- <sup>51</sup> Proceedings of the City Council of the City of Coralville (Aug. 26, 2025) [hereinafter Proceedings of the City Council of the City Of Coralville (Aug. 26, 2025)], <https://www.coralville.org/AgendaCenter/ViewFile/Minutes/08262025-1885> [<https://perma.cc/Y49C-39FU>].
- <sup>52</sup> Proceedings of the City Council of the City Of Coralville (Aug. 26, 2025) [<https://perma.cc/Y49C-39FU>].
- <sup>53</sup> Proceedings of the City Council of the City Of Coralville (Aug. 26, 2025) [<https://perma.cc/Y49C-39FU>].
- <sup>54</sup> Proceedings of the City Council of the City Of Coralville (Aug. 26, 2025) [<https://perma.cc/Y49C-39FU>].
- <sup>55</sup> Proceedings of the City Council of the City Of Coralville (Aug. 26, 2025) [<https://perma.cc/Y49C-39FU>].
- <sup>56</sup> Max Miller, *Cities Are Fighting Back Against the Law-Breaking Flock License Plate Cameras*, Yahoo! News (Oct. 11, 2025), <https://www.yahoo.com/news/articles/cities-fighting-back-against-law-011500912.html> [<https://perma.cc/5XHE-WT8Q>]; Rebecca Hansen-White, *Eugene City Council Asks to Turn Flock Cameras off Amidst Fears of Federal Misuse*, KCLL (Oct. 8, 2025), <https://www.klcc.org/politics-government/2025-10-08/eugene-city-council-asks-to-turn-flock-cameras-off-amidst-fears-of-federal-misuse> [<https://perma.cc/ASP6-VYA9>]; Catharine Li, *Austin to End License Plate Data Collection Program Following Audit, Community Pushback*, The Daily Texan (June 15, 2025), <https://thedailytexan.com/2025/06/15/austin-to-end-license-plate-data-collection-program-following-audit-community-pushback/> [<https://perma.cc/2BLX-42ZF>]; Nate Belt, *Denver City Council Votes Against License Plate Readers Renewal, Citing Public Safety Concerns*, Fox 31 (May 5, 2025), <https://kdvr.com/news/politics/denver-city-council-votes-against-license-plate-readers-renewal-citing-public-safety-concerns/> [<https://perma.cc/H47Y-Q4TT>]; Kevin Collier, *Police Cameras Track Billions of License Plates Per Month. Communities are Pushing Back*, NBC News (Nov. 1, 2025), <https://www.nbcnews.com/tech/tech-news/flock-police-cameras-scan-billions-month-sparking-protests-rcna230037> [<https://perma.cc/XE2A-8TYW>]; Brenda Heffernan, *Oak Park Terminates Flock License Plate Reader Contract*, Wednesday Journal (Aug. 7, 2025), <https://www.oakpark.com/2025/08/07/oak-park-terminates-flock-license-plate-reader-contract/> [<https://perma.cc/3YQY-AFAQ>]; Frank Lenzi, *Redmond Police Temporarily Shut Down ‘Flock’ License Plate Reader Program*, MyNorthwest (Nov. 5, 2025), <https://mynorthwest.com/local/flock-license-plate-reader/4152388> [<https://perma.cc/AA9B-DWM5>]; Logan Hall, *Cambridge Stops Using License Plate Reader Cameras Over Data Sharing Concerns*, CBS News (Oct. 22, 2025), <https://www.cbsnews.com/boston/news/cambridge-license-plate-reader-cameras-data-concerns/> [<https://perma.cc/6D3T-2TMF>]; Susan Samples, *Kzoo Police Shut Down Immigration-Related Use of License Plate Readers*, Wood TV (June 7, 2025), <https://www.woodtv.com/news/kalamazoo-county/kzoo-police-shut-down-immigration-related-use-of-license-plate-readers/> [<https://perma.cc/G4N9-PL88>]; Kunle Falayi, *Virginia Surveillance Network Tapped Thousands of Times for Immigration Cases*, WHRO Public Media (Sept. 24, 2025), <https://www.whro.org/virginia-center-for-investigative-journalism/2025-09-24/vcij-flock-surveillance-ice-immigration-enforcement> [<https://perma.cc/J3Z3-R6E7>].
- <sup>57</sup> Letter from Ron Wyden, U.S. Sen. of Oregon, to Garrett Langley, Chief Exec. Officer, Flock Safety (Oct. 16, 2025), [https://www.wyden.senate.gov/imo/media/doc/wyden\\_letter\\_to\\_flock.pdf](https://www.wyden.senate.gov/imo/media/doc/wyden_letter_to_flock.pdf) [<https://perma.cc/93EQ-ZFBU>].

---

<sup>58</sup> See generally Whitney K. Novak, Cong. Rsch. Serv., Policing the Police: Qualified Immunity and Considerations for Congress 1 (2023), [https://www.congress.gov/crs\\_external\\_products/LSB/PDF/LSB10492/LSB10492.4.pdf](https://www.congress.gov/crs_external_products/LSB/PDF/LSB10492/LSB10492.4.pdf) [<https://perma.cc/YA44-LMC7>].

<sup>59</sup> Proceedings of the City Council of the City Of Coralville, Johnson County, Iowa Subject to the Approval by the Coralville City Council at a Subsequent Meeting 7 (Sept. 23, 2025) [hereinafter Proceedings of the City Council of the City Of Coralville Sept. 23, 2025] (discussing how people will avoid travelling to communities where they do not feel safe from government surveillance) [<https://perma.cc/D3KE-CTS5>].

<sup>60</sup> See, e.g., *Edwards v. California*, 314 U.S. 160, 181 (1941) (Douglas, J., concurring) (“[T]he right of free movement is a right of national citizenship.”); *Att’y Gen. of N.Y. v. Soto-Lopez*, 476 U.S. 898, 903 (1986) (“[T]he right to migrate is firmly established and has been repeatedly recognized by our cases.”); see also Noah Smith-Drelich, *The Forgotten Fundamental Right to Free Movement*, 119 Nw. U. L. Rev. 811, 815 (2025).

<sup>61</sup> Noah Smith-Drelich, *The Forgotten Fundamental Right to Free Movement*, 119 Nw. U. L. Rev. 811, 815 (2025).

<sup>62</sup> See Mina Loldj & Grady Vaughan, *Mobility Restrictions as a Form of Repression*, Freedom House (Aug. 22, 2024), <https://freedomhouse.org/article/mobility-restrictions-form-repression> [<https://perma.cc/52CT-5KRB>].

<sup>63</sup> See, e.g., *Jones v. Helms*, 452 U.S. 412 (1981) (“Despite the fundamental nature of [the right to move freely], there nonetheless are situations in which a State may prevent a citizen from [freely traveling].”); *United States v. Smedley*, 611 F. Supp. 2d 971 (E.D. Mo. 2009) (“[F]reedom of movement among locations ... [is] fundamental to ... personal liberty.”); *Lutz v. City of York*, 899 F.2d 255 (3rd Cir. 1990) (holding that restrictions on freedom of movement must be “narrowly tailored to meet significant city objectives.”); *Larson v. City of Minneapolis*, 568 F. Supp. 3d 997 (D. Minn. 2021) (citing *Lutz*, 899 F.2d at 269–70) (“[T]he right to travel cannot conceivably imply the right to travel whenever, wherever and however one pleases—even on roads specifically designed for public travel.”).

<sup>64</sup> See, e.g., *Saenz v. Roe*, 526 U.S. 489, 500 (1999) (discussing Privileges and Immunities Clause as protecting the right to travel, including the right: (1) of citizens of one state to enter and exit other states; (2) “to be treated as a welcome visitor” when they are away from their home state; and (3) of travelers who become permanent residents to be treated like citizens of that State); *Ten. Wine & Spirits Retailers Ass’n v. Thomas*, 588 U.S. 504, 514 (2019) (stating that the Dormant Commerce Clause “prohibits state laws that unduly restrict interstate commerce.”); see also Noah Smith-Drelich, *Travel Rights in a Culture War*, 101 Tex. L. Rev. Online 21, 27 (2022) (discussing the right to travel as protecting the right to do business across state borders); Noah Smith-Drelich, *The Forgotten Fundamental Right to Free Movement*, 119 Nw. U. L. Rev. 811, 816 (2025) (discussing limitations on the right to travel).

<sup>65</sup> U.S. Const. amend. I.

<sup>66</sup> See U.S. Const. amend. I; see, e.g., *NAACP v. Alabama*, 357 U.S. 449 (1958); *Roberts v. Jaycees*, 468 U.S. 609 (1984); Information Institute, *Amdt1.8.1 Overview of Freedom of Association*, Cornell L. Sch., <https://www.law.cornell.edu/constitution-conan/amendment-1/overview-of-freedom-of-association> [<https://perma.cc/H3LQ-XJV9>] (last visited Nov. 3, 2025).

<sup>67</sup> See *Am. Prosperity Found. v. Bonta*, 594 U.S. 595, 618 (2021).

---

<sup>68</sup> Michael S. Wilson, *Freedom of Unformed Association*, 101 N.C. L. Rev. F. 162, 163 (2023) (discussing how political association is protected by the first amendment from government suppression).

<sup>69</sup> *Am. Prosperity Foundation v. Bonta*, 594 U.S. 595, 618 (2021). A chilling effect is the “consequence of a policy ... which discourages the exercise of a legal right. Const. L. Deskbook § 8:19 (2025).

<sup>70</sup> *Am. Prosperity Found. v. Bonta*, 594 U.S. 595, 618 (2021); see John L. Carbonari, *Why Courts Should Recognize Constitutional Chilling Under the Free Exercise Clause*, 61 Hous. L. Rev. 181, 181 (2023) (“Chilling occurs when an individual self-censors out of fear that engaging in such conduct could result in some retributive response.”); Legal Info. Inst., *Amdt 1.8.1 Overview of Freedom of Association*, Cornell L. Sch., <https://www.law.cornell.edu/constitution-conan/amendment-1/overview-of-freedom-of-association> [<https://perma.cc/H3LQ-XJV9>] (last visited Nov. 3, 2025).

<sup>71</sup> U.S. Const. amend. I.

<sup>72</sup> There are many exceptions to the warrant requirement, including searches incident to lawful arrest, consent, and when something is in plain view of the officers, among others. See Michael Gentithes, *Exigencies, Not Exceptions: How to Return Warrant Exceptions to Their Roots*, 25 J. Const. L. 59, 60–61 (2023) (discussing the “labyrinth of exceptions” that exist for the Fourth Amendment warrant requirement).

<sup>73</sup> U.S. Const. amend. IV.

<sup>74</sup> U.S. Const. amend. IV.

<sup>75</sup> *Katz v. United States*, 389 U.S. 347, 361 (1967) (Harlan, J., concurring) (discussing that in the context of the fourth amendment an expectation of privacy exists where “first, . . . a person [has] exhibited an actual (subjective) expectation of privacy and, second, that the expectation be one that society is prepared to recognize as ‘reasonable.’”). People do not generally have a legitimate expectation of privacy in information they willingly reveal to third parties, whether in public or in private. See, e.g., *Smith v. Maryland*, 442 U.S. 735 (1979). But norms are changing when it comes to searches of public movement and data held by third parties that can reveal and intimate picture of someone’s life. See, e.g., *United States v. Jones*, 565 U.S. 400, 404 (2012) (holding that people have a reasonable expectation that law enforcement agents cannot and should not be able to monitor and record every movement of a person’s car for an extended period of time without a valid warrant); *Carpenter v. United States*, 585 U.S. 296, 308 (2018) (determining that people do have an expectation of privacy in making calls and engaging in activities on their cell phones where the data would be recorded in databases, and that searching these databases without a valid warrant is an unreasonable search).

<sup>76</sup> *Commonwealth v. McCarthy*, 142 N.E.3d 1090, 1103–05 (Mass. 2020) (discussing how when determine whether ALPRs violate constitutional protections both the local and number of cameras should be considered). The police had used ALPR data collected by four cameras located on two bridges to trace McCarthy’s whereabouts and eventually connect him to the suspicious incidents. *Id.* at 1095. McCarthy subsequently appealed arguing that use of the ALPR database was a search under the Fourth Amendment and without a warrant, the search was unreasonable. *Id.* at 1097. The court looked at “(1) the searches durations, (2) its surreptitious nature, and (3) the access it may grant to otherwise unknowable categories of information, which includes the polices new-found ability to both ascertain real-time location data and to ‘travel back in time to retrace a person’s whereabouts.’” *Id.* at 1100. Ultimately, the court decided that in that case, the use of ALPRs was *not* a search. *Id.* at 1106. Although, the judge writing for the court did note that while McCarthy may have had a reasonable expectation of privacy, “in the whole of his public movements, an interest [in privacy] which potentially could be implicated by the widespread use of ALPRs, that interest is not invaded by the limited extent and use of ALPR data in this case.” *Id.* at 1095. This shows that

---

ALPRs could be considered a search in the right circumstances. However, in this case, the ALPRs were not used extensively enough to sufficiently invade into McCarthy’s privacy as to warrant it a “search.” *Id.* at 1095.

<sup>77</sup> *Commonwealth v. McCarthy*, 142 N.E.3d 1090, 1105, 1107 (Mass. 2020).

<sup>78</sup> *Commonwealth v. Bell*, 113 Va. Cir. 316 (Va. Cir. Ct. 2024) (holding that the cities use of 172 cameras that record license plate information and vehicle characteristics constitutes a search under the Fourth Amendment).

<sup>79</sup> *United States v. Yang*, 958 F.3d 851, 863–64 (9th Cir. 2020) (Bea, J., concurring) (quoting *Carpenter v. United States*, 585 U.S. 296, 310 (2018)) (discussing how if ALPR become more sophisticated to show a more complete picture of someone’s movement that they may constitute a search under the Fourth Amendment).

<sup>80</sup> *See e.g.*, *Commonwealth v. McCarthy*, 142 N.E.3d 1090, 1103–06 (Mass. 2020) (holding that in Massachusetts a limited use of ALPRs may not violate privacy interests); *Jones v. Helms*, 452 U.S. 412 (1981) (finding that states can violate fundamental rights in specific instances).

<sup>81</sup> Iowa law does establish that ALPR data cannot be stored for more than 30 days unless it is relevant to an ongoing investigation. Iowa Code § 321P.4 (2024).

<sup>82</sup> Alabama, Arkansas, California, Colorado, Florida, Georgia, Idaho, Illinois, Kansas, Maine, Maryland, Minnesota, Montana, Nebraska, New Hampshire, North Carolina, Oklahoma, Rhode Island, Tennessee, Utah, Vermont, and Virginia all have state statutes in place for ALPR use. Additionally, the District of Columbia and the U.S. Virgin Islands also have local statutes in place. Legis. Analysis & Pub. Pol’y Ass’n, Automatic License Plate Recognition Systems: Summary Of State Laws, NCSL (2025), <https://legislativeanalysis.org/wp-content/uploads/2025/09/Automatic-License-Plate-Recognition-Systems-Summary-of-State-Laws.pdf> [<https://perma.cc/AZN2-AVZ7>].

<sup>83</sup> 625 Ill. Comp. Stat. 5/2-130 (2025); Kan. Stat. § 45-217–45-221 (2025); Minn. Stat. § 13.824 (2024); Neb. Rev. Stat. § 60-3201 (2025).

<sup>84</sup> Neb. Rev. Stat. § 60-3203.

<sup>85</sup> Neb. Rev. Stat. § 60-3204.

<sup>86</sup> Neb. Rev. Stat. § 60-3206.

<sup>87</sup> Neb. Rev. Stat. § 60-3209(2).

<sup>88</sup> Minn. Stat. § 13.824(2)(1)–(3).

<sup>89</sup> Minn. Stat. § 13.824(2).

<sup>90</sup> Minn. Stat. § 13.824(3).

<sup>91</sup> Minn. Stat. § 13.824(2)(1)–(3).

<sup>92</sup> Minn. Stat. § 13.824(3).

<sup>93</sup> 625 Ill. Comp. Stat. 5/2-130 § (b)(1)-(2) (2025).

<sup>94</sup> 625 Ill. Comp. Stat. 5/2-130 § (c).

<sup>95</sup> Kan. Stat. § 45-220–45-221 (2025).

<sup>96</sup> Iowa Const., art. I, § 8.

<sup>97</sup> *See State v. Ochoa*, 792 N.W.2d 260, 291 (Iowa 2010) (rejecting the holding of *Samson v. California*, 547 U.S. 843 (2006), finding more protections for parolees in Iowa); *State v. Cline*, 617 N.W.2d 277, 293 (Iowa 2000), *abrogated in part by State v. Turner*, 630 N.W.2d 601 (Iowa 2001)

---

(determining that the good faith exception to warrantless searches does not apply in Iowa); *State v. Wright*, 961 N.W.2d 396, 420 (Iowa 2021) (finding that unwarranted searches of trash bags is an unreasonable search and seizure).

<sup>98</sup> H.F. 2681, 90th Gen. Assem., Sess. (Iowa 2023).

<sup>99</sup> See Appendices A and B of this report.

<sup>100</sup> We sent a template request to agencies. For some, the clinic had recently received records related to ALPR, so the time frame for invoices, contracts, memoranda of understanding, and policies was adjusted to be from Oct. 2024 to the present. See Appendix A of this report for a copy of the template request the clinic used.

<sup>101</sup> Iowa Code § 22.8(4); *Belin v. Reynolds*, 989 N.W.2d 166, 172 (Iowa 2023) (unreasonable delay violates Chapter 22); *Horsfield Materials Inc. v. City of Dyersville*, 834 N.W.2d 444, 461-62 (Iowa 2013).

<sup>102</sup> The Fayette County Sheriff's Office, the Fremont County Sheriff's Office, and the Clinton Police Department never responded to our records requests despite multiple email and phone call follow ups. Mills County Sheriff informed us that they did not have the staffing capacity to be able to fulfill our request in a timely manner.

<sup>103</sup> Response from Lyndsey Seifert, Recs. Bureau Supervisor, Davenport Police Dep't, to University of Iowa Technology Law Clinic (Sept. 17, 2025), [\[link\]](#).

<sup>104</sup> Email from Shawn Roth, Chief Deputy, Scott County Sheriff's Office, to University of Iowa Technology Law Clinic (Sept. 19, 2025), [\[link\]](#).

<sup>105</sup> Response from Rob Johansen, Chief of Police, Urbandale Police Dep't, to University of Iowa Technology Law Clinic (Sept. 25, 2025), [\[link\]](#); Response from Lyndsey Seifert, Recs. Bureau Supervisor, Davenport Police Dep't, to University of Iowa Technology Law Clinic (Sept. 17, 2025), [\[link\]](#); Email from Leslie C. Behaunek, NYEmaster, to University of Iowa Technology Law Clinic (Sept. 24, 2025), [\[link\]](#) (responding to our records request on behalf of the Clive Police Department).

<sup>106</sup> *Clive IA PD Transparency Portal*, Flock Safety (Nov. 20, 2025), <https://transparency.flocksafety.com/clive-ia-pd> [\[https://perma.cc/R2BG-DD5N\]](https://perma.cc/R2BG-DD5N); *Davenport IA PD Transparency Portal*, Flock Safety (Nov. 14, 2025), <https://transparency.flocksafety.com/davenport-ia-pd> [\[https://perma.cc/C56J-RHDM\]](https://perma.cc/C56J-RHDM); *Urbandale IA PD Transparency Portal*, Flock Safety (Nov. 14, 2025), <https://transparency.flocksafety.com/urbandale-ia-pd> [\[https://perma.cc/M7Q4-PEM5\]](https://perma.cc/M7Q4-PEM5).

<sup>107</sup> For a more detailed list on the records obtained from individual agencies, see Appendix C of this report.

<sup>108</sup> Contract between the Altoona Police Department and Flock Safety (May 8, 2024) [\[link\]](#); Contract between the Ankeny Police Department and Flock Safety (July 6, 2022) [\[link\]](#); Contract between the Bettendorf Police Department and Flock Safety (June 24, 2024) [\[link\]](#); Contract between the Cedar Rapids Police Department and Flock Safety (Aug. 23, 2024) [\[link\]](#); Contract between the Clive Police Department and Flock Safety (Dec. 12, 2022) [\[link\]](#); Contract between the Coralville Police Department and Flock Safety (May 12, 2025) [\[link\]](#); Contract between the Council Bluffs Police Department and Flock Safety (July 27, 2023) [\[link\]](#); Contract between the Dubuque Police Department and Flock Safety (Aug. 28, 2023) [\[link\]](#); Contract between the Iowa Department of Public Safety and Flock Safety (June 4, 2025) [\[link\]](#); Invoice from Flock Safety to the Indianola Police Department (Apr. 21, 2024) [\[link\]](#); Memorandum of Understanding between the Johnson County Sheriff's Office and Flock Safety (Jan. 3, 2024) [\[link\]](#); Contract between the Johnston Police Department and Flock Safety (May 23, 2025) [\[link\]](#); Contract between the Marshalltown Police Department and Flock Safety (Dec. 1, 2023) [\[link\]](#); Contract between the Newton Police Department and Flock Safety (Jan. 3, 2024) [\[link\]](#); Contract between the North Liberty Police Department and



---

Flock Safety (June 18, 2024) [\[link\]](#); Contract between the Oelwein Police Department and Flock Safety (May 22, 2025) [\[link\]](#); Contract between the Pottawattamie County Sheriff's Office and Flock Safety (May 28, 2025) [\[link\]](#); Contract between the Storm Lake Police Department and Flock Safety (July 10, 2024) [\[link\]](#); Contract between the Story County Sheriff's Office and Flock Safety (Feb. 20, 2024) [\[link\]](#); Contract between the Urbandale Police Department and Flock Safety (Apr. 6, 2022) [\[link\]](#); Contract between the Warren County Sheriff's Office and Flock Safety (Feb. 20, 2025) [\[link\]](#); Contract between the Waukee Police Department and Flock Safety (July 26, 2023) [\[link\]](#); Contract between the West Des Moines Police Department and Flock Safety (June 23, 2020) [\[link\]](#). While the Clinton Police Department never responded to our records request, the existence of an active Flock Transparency Portal for the Clinton Police Department indicates they too have an existing contract with Flock Safety. *See Clinton IA PD: Transparency Portal*, Flock Safety (Nov. 3, 2025), <https://transparency.flocksafety.com/clinton-ia-pd> [\[https://perma.cc/SB4W-E6R5\]](https://perma.cc/SB4W-E6R5). Additionally, while the Davenport Police Department stated that their records were confidential, a previous request by the clinic in the Fall of 2024 returned an invoice from Flock Safety to the Davenport Police Department. Invoice from Flock Safety to the Davenport Police Department (Aug. 28, 2024) [\[link\]](#).

<sup>109</sup> *Compare* Contract between the Council Bluffs Police Department and Flock Safety (July 27, 2023) [\[link\]](#) (having an initial term of 60 months), *with* Contract between the Oelwein Police Department and Flock Safety (May 22, 2025) [\[link\]](#) (having an initial term of 12 months).

<sup>110</sup> **15** of the **27** Flock agencies have known contracts that have an initial term of 24 months. *See e.g.*, Contract between the Altoona Police Department and Flock Safety (May 8, 2024) [\[link\]](#); Contract between the Ankeny Police Department and Flock Safety (July 6, 2022) [\[link\]](#); Contract between the Bettendorf Police Department and Flock Safety (June 24, 2024) [\[link\]](#); Contract between the Cedar Rapids Police Department and Flock Safety (Aug. 23, 2024) [\[link\]](#); Contract between the Coralville Police Department and Flock Safety (May 12, 2025) [\[link\]](#); Contract between the Dubuque Police Department and Flock Safety (Aug. 28, 2023) [\[link\]](#); Contract between the Marshalltown Police Department and Flock Safety (Dec. 1, 2023) [\[link\]](#); Contract between the Newton Police Department and Flock Safety (Jan. 3, 2024) [\[link\]](#); Contract between the North Liberty Police Department and Flock Safety (June 18, 2024) [\[link\]](#); Contract between the Pottawattamie County Sheriff's Office and Flock Safety (May 28, 2025) [\[link\]](#); Contract between the Storm Lake Police Department and Flock Safety (July 10, 2024) [\[link\]](#); Contract between the Story County Sheriff's Office and Flock Safety (Feb. 20, 2024) [\[link\]](#); Contract between the Warren County Sheriff's Office and Flock Safety (Feb. 20, 2025) [\[link\]](#); Contract between the Waukee Police Department and Flock Safety (July 26, 2023) [\[link\]](#); Contract between the West Des Moines Police Department and Flock Safety (June 23, 2020) [\[link\]](#).

<sup>111</sup> Contract between the Cedar Rapids Police Department and Flock Safety (Aug. 23, 2024) [\[link\]](#).

<sup>112</sup> Contract between the Cedar Rapids Police Department and Flock Safety (Aug. 23, 2024) [\[link\]](#).

<sup>113</sup> Contract between the Clive Police Department and Flock Safety (Dec. 12, 2022) [\[link\]](#).

<sup>114</sup> Memorandum of Understanding between the Altoona Police Department and Flock Safety (Oct. 8, 2021) [\[link\]](#); Memorandum of Understanding between the Clive Police Department and Flock Safety (June 2, 2022) [\[link\]](#); Memorandum of Understanding between the Iowa Department of Public Safety and Flock Safety (May 30, 2025) [\[link\]](#); Memorandum of Understanding between the Johnson County Sheriff's Office and Flock Safety (Jan. 1, 2024) [\[link\]](#); Memorandum of Understanding between the Johnston Police Department and Flock Safety (June 12, 2023) [\[link\]](#). Only one memorandum of understanding that we received did not include a purpose that generally fit this description, in that singular memorandum of understanding there was no similarly listed purpose to limit ALPR use. Memorandum of Understanding between the Scott County Sheriff's Office and Vigilant Solutions [\[link\]](#).

---

<sup>115</sup> See e.g., Master Services and Purchasing Agreement between the Altoona Police Department and Axon Enterprise, Inc. (June 13, 2025) [\[link\]](#); Master Services and Purchasing Agreement between the Ankeny Police Department and Axon Enterprise, Inc. (Aug. 18, 2023) [\[link\]](#); Master Services and Purchasing Agreement between the Black Hawk County Sheriff's Office and Axon Enterprise, Inc. (Aug. 2, 2024) [\[link\]](#); Master Services and Purchasing Agreement for Customer between the Clinton County Sheriff's Office and Axon Enterprises, Inc. (Aug. 2, 2024) [\[link\]](#); Contract between the Marion Police Department and Axon Enterprises, Inc. (Sept. 21, 2023) [\[link\]](#); Master Services and Purchasing Agreement between the Waterloo Police Department and Axon Enterprises, Inc. (Feb. 16, 2021) [\[link\]](#).

<sup>116</sup> See e.g., Master Services and Purchasing Agreement between the Altoona Police Department and Axon Enterprise, Inc. (June 13, 2025) [\[link\]](#); Master Services and Purchasing Agreement between the Ankeny Police Department and Axon Enterprise, Inc. (Aug. 18, 2023) [\[link\]](#); Master Services and Purchasing Agreement between the Black Hawk County Sheriff's Office and Axon Enterprise, Inc. (Aug. 2, 2024) [\[link\]](#); Master Services and Purchasing Agreement for Customer between the Clinton County Sheriff's Office and Axon Enterprises, Inc. (Aug. 2, 2024) [\[link\]](#); Contract between the Marion Police Department and Axon Enterprises, Inc. (Sept. 21, 2023) [\[link\]](#); Master Services and Purchasing Agreement between the Waterloo Police Department and Axon Enterprises, Inc. (Feb. 16, 2021) [\[link\]](#).

<sup>117</sup> See e.g., Master Services and Purchasing Agreement between the Altoona Police Department and Axon Enterprise, Inc. (June 13, 2025) [\[link\]](#).

<sup>118</sup> See e.g., Master Services and Purchasing Agreement between the Altoona Police Department and Axon Enterprise, Inc. (June 13, 2025) [\[link\]](#).

<sup>119</sup> See e.g., Project Quotation from Motorola Solutions to the Altoona Police Department (Aug. 18, 2023) [\[link\]](#); Purchase Order from the Ames Police Department to Motorola Solutions, Inc. (Sept. 22, 2025) [\[link\]](#); Invoice from Vigilant Solutions to the Fremont County Sheriff's Office (July 17, 2024) [\[link\]](#); Invoice from Vigilant Solutions to the Scott County Sheriff's Office (Aug. 23, 2024) [\[link\]](#).

<sup>120</sup> Memorandum of Understanding between the Scott County Sheriff's Office and Vigilant Solutions [\[link\]](#).

<sup>121</sup> See note 114 and accompanying text.

<sup>122</sup> See Appendix C of this report.

<sup>123</sup> See Appendix C of this report.

<sup>124</sup> See Appendix C of this report.

<sup>125</sup> See Appendix C of this report.

<sup>126</sup> See, e.g., Altoona Police Dep't, Automated License Plate Readers (ALPRs): Policy 424 (2024) [\[link\]](#); Ankeny Police Dep't, Automated License Plate Readers (ALPRs): Policy 430 (2025) [\[link\]](#); Clinton Police Dep't, Automated License Plate Readers (ALPRs): Policy 427 (2024) [\[link\]](#); Coralville Police Dep't, Automated License Plate Readers (ALPRs): Policy 427 (2025) [\[link\]](#); Council Bluffs Police Dep't, Automated License Plate Readers (ALPRs): Policy 427 (2025) [\[link\]](#); Johnson County Sheriff's Office, Automated License Plate Readers (ALPRs) (2024) [\[link\]](#); Johnston Police Dep't, Automated License Plate Reader (ALPR) (2023) [\[link\]](#); Marshalltown Police Dep't, Automated License Plate Readers (ALPRs): Policy 427 (2025) [\[link\]](#); Newton Police Dep't, Automated License Plate Readers (ALPRs): Policy 425 (2025) [\[link\]](#); North Liberty Police Dep't, Automated License Plate Readers (ALPRs): Policy 433 (2024) [\[link\]](#); Oelwein Police Dep't, Automated License Plate Readers (ALPRs): Policy 427 (2025) [\[link\]](#); Pottawattamie County Sheriff's Office, Automated License Plate Readers (ALPRs): Policy 346 (2025) [\[link\]](#); Storm Lake Police Dep't, Automated License Plate Readers (ALPRs): Standard Operating Guidelines 526 (2025) [\[link\]](#); Story County Sheriff's Office, General



---

Order: Automated License Plate Readers (ALPRs) (2024) [\[link\]](#); West Des Moines Police Dep't, Automated License Plate Readers (ALPRs) (2025) [\[link\]](#).

<sup>127</sup> See, e.g., Altoona Police Dep't, Automated License Plate Readers (ALPRs): Policy 424 (2024) [\[link\]](#); Ankeny Police Dep't, Automated License Plate Readers (ALPRs): Policy 430 (2025) [\[link\]](#); Bettendorf Police Dep't, Bettendorf Police Directive: License Plate Recognition (LPR) Program (2024) [\[link\]](#); Cedar Rapids Police Dep't, Automated License Plate Recognitions (ALPR) (2024) [\[link\]](#); Clinton Police Dep't, Automated License Plate Readers (ALPRs): Policy 427 (2024) [\[link\]](#); Clive Police Dep't, Police Department Policy and Procedure Manual: License Plate Recognitions (LPR) Systems (2023) [\[link\]](#); Coralville Police Dep't, Automated License Plate Readers (ALPRs): Policy 427 (2025) [\[link\]](#); Council Bluffs Police Dep't, Automated License Plate Readers (ALPRs): Policy 427 (2025) [\[link\]](#); Davenport Police Dep't, License Plate Recognition (LPR) Systems: No. 0625 (2024) [\[link\]](#); City of Dubuque, Safety and Security Camera Acceptable Use Policy: No. 4.23 (2023) [\[link\]](#); Glenwood Police Dep't, Glenwood Police Department's Standard Operating Procedure: Security and LPR Camera Policy (2025) [\[link\]](#); Indianola Police Dep't, License Plate Recognitions (LPR) Systems (2024) [\[link\]](#); Johnson County Sheriff's Office, Automated License Plate Readers (ALPRs) (2024) [\[link\]](#); Johnston Police Dep't, Automated License Plate Reader (ALPR) (2023) [\[link\]](#); Linn County Sheriff's Office, Automated License Plate Readers (ALPRs): Policy 427 (2025) [\[link\]](#); Marion Police Dep't, Operational Policy (2024) [\[link\]](#); Marshalltown Police Dep't, Automated License Plate Readers (ALPRs): Policy 427 (2025) [\[link\]](#); Newton Police Dep't, Automated License Plate Readers (ALPRs): Policy 425 (2025) [\[link\]](#); North Liberty Police Dep't, Automated License Plate Readers (ALPRs): Policy 433 (2024) [\[link\]](#); Oelwein Police Dep't, Automated License Plate Readers (ALPRs): Policy 427 (2025) [\[link\]](#); Pottawattamie County Sheriff's Office, Automated License Plate Readers (ALPRs): Policy 346 (2025) [\[link\]](#); Scott County Sheriff's Office, General Order: Automated License Plate Reader (ALPR) [\[link\]](#); Storm Lake Police Dep't, Automated License Plate Readers (ALPRs): Standard Operating Guidelines 526 (2025) [\[link\]](#); Story County Sheriff's Office, General Order: Automated License Plate Readers (ALPRs) (2024) [\[link\]](#); Urbandale Police Dep't, License Plate Recognition Systems and Traffic Camera Recording System: Policy/Procedure #: 9 [\[link\]](#); Warren County Sheriff's Office, Policy Manual (2024) [\[link\]](#); Waterloo Police Dep't, Automated License Plate Readers (ALPRs): Policy 425 (2025) [\[link\]](#); Waukegan Police Dep't, Written Directive: License Plate Recognition (LPR) Systems (2023) [\[link\]](#); West Des Moines Police Dep't, Automated License Plate Readers (ALPRs) (2025) [\[link\]](#).

<sup>128</sup> Specifically, this language states, "The purpose of this policy is to provide guidance for the capture, storage and use of digital data obtained through the use of Automated License Plate Reader (ALPR) technology." See, e.g., Altoona Police Dep't, Automated License Plate Readers (ALPRs): Policy 424 (2024) [\[link\]](#); Ankeny Police Dep't, Automated License Plate Readers (ALPRs): Policy 430 (2025) [\[link\]](#); Clinton Police Dep't, Automated License Plate Readers (ALPRs): Policy 427 (2024) [\[link\]](#); Coralville Police Dep't, Automated License Plate Readers (ALPRs): Policy 427 (2025) [\[link\]](#); Council Bluffs Police Dep't, Automated License Plate Readers (ALPRs): Policy 427 (2025) [\[link\]](#); Johnson County Sheriff's Office, Automated License Plate Readers (ALPRs) (2024), [\[link\]](#); Johnston Police Dep't, Automated License Plate Reader (ALPR) (2023) [\[link\]](#); Marshalltown Police Dep't, Automated License Plate Readers (ALPRs): Policy 427 (2025) [\[link\]](#); Newton Police Dep't, Automated License Plate Readers (ALPRs): Policy 425 (2025) [\[link\]](#); North Liberty Police Dep't, Automated License Plate Readers (ALPRs): Policy 433 (2024) [\[link\]](#); Oelwein Police Dep't, Automated License Plate Readers (ALPRs): Policy 427 (2025) [\[link\]](#); Pottawattamie County Sheriff's Office, Automated License Plate Readers (ALPRs): Policy 346 (2025) [\[link\]](#); Storm Lake Police Dep't, Automated License Plate Readers (ALPRs): Standard Operating Guidelines 526 (2025) [\[link\]](#); Story County Sheriff's Office, General Order: Automated License Plate Readers (ALPRs) (2024) [\[link\]](#); West Des Moines Police Dep't, Automated License Plate Readers (ALPRs) (2025) [\[link\]](#).

<sup>129</sup> See, e.g., Altoona Police Dep't, Automated License Plate Readers (ALPRs): Policy 424 (2024) [\[link\]](#); Ankeny Police Dep't, Automated License Plate Readers (ALPRs): Policy 430 (2025) [\[link\]](#); Bettendorf

---

Police Dep't, Bettendorf Police Directive: License Plate Recognition (LPR) Program (2024) [\[link\]](#); Cedar Rapids Police Dep't, Automated License Plate Recognitions (ALPR) (2024) [\[link\]](#); Clinton Police Dep't, Automated License Plate Readers (ALPRs): Policy 427 (2024) [\[link\]](#); Clive Police Dep't, Police Department Policy and Procedure Manual: License Plate Recognitions (LPR) Systems (2023) [\[link\]](#); Coralville Police Dep't, Automated License Plate Readers (ALPRs): Policy 427 (2025) [\[link\]](#); Davenport Police Dep't, License Plate Recognition (LPR) Systems: No. 0625 (2024) [\[link\]](#); City of Dubuque, Safety and Security Camera Acceptable Use Policy: No. 4.23 (2023) [\[link\]](#); Indianola Police Dep't, License Plate Recognitions (LPR) Systems (2024) [\[link\]](#); Johnson County Sheriff's Office, Automated License Plate Readers (ALPRs) (2024) [\[link\]](#); Johnston Police Dep't, Automated License Plate Reader (ALPR) (2023) [\[link\]](#); Linn County Sheriff's Office, Automated License Plate Readers (ALPRs): Policy 427 (2025) [\[link\]](#); Marion Police Dep't, Operational Policy (2024) [\[link\]](#); Marshalltown Police Dep't, Automated License Plate Readers (ALPRs): Policy 427 (2025) [\[link\]](#); Newton Police Dep't, Automated License Plate Readers (ALPRs): Policy 425 (2025) [\[link\]](#); North Liberty Police Dep't, Automated License Plate Readers (ALPRs): Policy 433 (2024) [\[link\]](#); Oelwein Police Dep't, Automated License Plate Readers (ALPRs): Policy 427 (2025) [\[link\]](#); Storm Lake Police Dep't, Automated License Plate Readers (ALPRs): Standard Operating Guidelines 526 (2025) [\[link\]](#); Story County Sheriff's Office, General Order: Automated License Plate Readers (ALPRs) (2024) [\[link\]](#); Urbandale Police Dep't, License Plate Recognition Systems and Traffic Camera Recording System: Policy/Procedure #: 9 [\[link\]](#); Waterloo Police Dep't, Automated License Plate Readers (ALPRs): Policy 425 (2025) [\[link\]](#); Waukee Police Dep't, Written Directive: License Plate Recognition (LPR) Systems (2023) [\[link\]](#); West Des Moines Police Dep't, Automated License Plate Readers (ALPRs) (2025) [\[link\]](#).

<sup>130</sup> See, e.g., Altoona Police Dep't, Automated License Plate Readers (ALPRs): Policy 424 (2024) [\[link\]](#); Ankeny Police Dep't, Automated License Plate Readers (ALPRs): Policy 430 (2025) [\[link\]](#); Bettendorf Police Dep't, Bettendorf Police Directive: License Plate Recognition (LPR) Program (2024) [\[link\]](#); Cedar Rapids Police Dep't, Automated License Plate Recognitions (ALPR) (2024) [\[link\]](#); Clinton Police Dep't, Automated License Plate Readers (ALPRs): Policy 427 (2024) [\[link\]](#); Clive Police Dep't, Police Department Policy and Procedure Manual: License Plate Recognitions (LPR) Systems (2023) [\[link\]](#); Coralville Police Dep't, Automated License Plate Readers (ALPRs): Policy 427 (2025) [\[link\]](#); Council Bluffs Police Dep't, Automated License Plate Readers (ALPRs): Policy 427 (2025) [\[link\]](#); Davenport Police Dep't, License Plate Recognition (LPR) Systems: No. 0625 (2024) [\[link\]](#); City of Dubuque, Safety and Security Camera Acceptable Use Policy: No. 4.23 (2023) [\[link\]](#); Glenwood Police Dep't, Glenwood Police Department's Standard Operating Procedure: Security and LPR Camera Policy (2025) [\[link\]](#); Indianola Police Dep't, License Plate Recognitions (LPR) Systems (2024) [\[link\]](#); Johnson County Sheriff's Office, Automated License Plate Readers (ALPRs) (2024) [\[link\]](#); Johnston Police Dep't, Automated License Plate Reader (ALPR) (2023) [\[link\]](#); Linn County Sheriff's Office, Automated License Plate Readers (ALPRs): Policy 427 (2025) [\[link\]](#); Marion Police Dep't, Operational Policy (2024) [\[link\]](#); Marshalltown Police Dep't, Automated License Plate Readers (ALPRs): Policy 427 (2025) [\[link\]](#); Newton Police Dep't, Automated License Plate Readers (ALPRs): Policy 425 (2025) [\[link\]](#); North Liberty Police Dep't, Automated License Plate Readers (ALPRs): Policy 433 (2024) [\[link\]](#); Oelwein Police Dep't, Automated License Plate Readers (ALPRs): Policy 427 (2025) [\[link\]](#); Pottawattamie County Sheriff's Office, Automated License Plate Readers (ALPRs): Policy 346 (2025) [\[link\]](#); Scott County Sheriff's Office, General Order: Automated License Plate Reader (ALPR) [\[link\]](#); Storm Lake Police Dep't, Automated License Plate Readers (ALPRs): Standard Operating Guidelines 526 (2025) [\[link\]](#); Story County Sheriff's Office, General Order: Automated License Plate Readers (ALPRs) (2024) [\[link\]](#); Urbandale Police Dep't, License Plate Recognition Systems and Traffic Camera Recording System: Policy/Procedure #: 9 [\[link\]](#); Warren County Sheriff's Office, Policy Manual (2024) [\[link\]](#); Waterloo Police Dep't, Automated License Plate Readers (ALPRs): Policy 425 (2025) [\[link\]](#); Waukee Police Dep't, Written Directive: License Plate

---

Recognition (LPR) Systems (2023) [\[link\]](#); West Des Moines Police Dep't, Automated License Plate Readers (ALPRs) (2025) [\[link\]](#).

<sup>131</sup> See, e.g., Iowa City, Iowa, Ordinance ch. 11, § 9-11-1 (2024).

<sup>132</sup> See, e.g., Altoona Police Dep't, Automated License Plate Readers (ALPRs): Policy 424 (2024) [\[link\]](#); Ankeny Police Dep't, Automated License Plate Readers (ALPRs): Policy 430 (2025) [\[link\]](#); Clinton Police Dep't, Automated License Plate Readers (ALPRs): Policy 427 (2024) [\[link\]](#); Coralville Police Dep't, Automated License Plate Readers (ALPRs): Policy 427 (2025) [\[link\]](#); Council Bluffs Police Dep't, Automated License Plate Readers (ALPRs): Policy 427 (2025) [\[link\]](#); City of Dubuque, Safety and Security Camera Acceptable Use Policy: No. 4.23 (2023) [\[link\]](#); Johnson County Sheriff's Office, Automated License Plate Readers (ALPRs) (2024) [\[link\]](#); Johnston Police Dep't, Automated License Plate Reader (ALPR) (2023) [\[link\]](#); Linn County Sheriff's Office, Automated License Plate Readers (ALPRs): Policy 427 (2025) [\[link\]](#); Marshalltown Police Dep't, Automated License Plate Readers (ALPRs): Policy 427 (2025) [\[link\]](#); Newton Police Dep't, Automated License Plate Readers (ALPRs): Policy 425 (2025) [\[link\]](#); North Liberty Police Dep't, Automated License Plate Readers (ALPRs): Policy 433 (2024) [\[link\]](#); Oelwein Police Dep't, Automated License Plate Readers (ALPRs): Policy 427 (2025) [\[link\]](#); Pottawattamie County Sheriff's Office, Automated License Plate Readers (ALPRs): Policy 346 (2025) [\[link\]](#); Storm Lake Police Dep't, Automated License Plate Readers (ALPRs): Standard Operating Guidelines 526 (2025) [\[link\]](#); Story County Sheriff's Office, General Order: Automated License Plate Readers (ALPRs) (2024) [\[link\]](#); Waterloo Police Dep't, Automated License Plate Readers (ALPRs): Policy 425 (2025) [\[link\]](#); West Des Moines Police Dep't, Automated License Plate Readers (ALPRs) (2025) [\[link\]](#).

<sup>133</sup> See, e.g., Altoona Police Dep't, Automated License Plate Readers (ALPRs): Policy 424 (2024) [\[link\]](#); Ankeny Police Dep't, Automated License Plate Readers (ALPRs): Policy 430 (2025) [\[link\]](#); Clinton Police Dep't, Automated License Plate Readers (ALPRs): Policy 427 (2024) [\[link\]](#); Coralville Police Dep't, Automated License Plate Readers (ALPRs): Policy 427 (2025) [\[link\]](#); Council Bluffs Police Dep't, Automated License Plate Readers (ALPRs): Policy 427 (2025) [\[link\]](#); City of Dubuque, Safety and Security Camera Acceptable Use Policy: No. 4.23 (2023) [\[link\]](#); Johnson County Sheriff's Office, Automated License Plate Readers (ALPRs) (2024) [\[link\]](#); Linn County Sheriff's Office, Automated License Plate Readers (ALPRs): Policy 427 (2025) [\[link\]](#); Marshalltown Police Dep't, Automated License Plate Readers (ALPRs): Policy 427 (2025) [\[link\]](#); Newton Police Dep't, Automated License Plate Readers (ALPRs): Policy 425 (2025) [\[link\]](#); Oelwein Police Dep't, Automated License Plate Readers (ALPRs): Policy 427 (2025) [\[link\]](#); Pottawattamie County Sheriff's Office, Automated License Plate Readers (ALPRs): Policy 346 (2025) [\[link\]](#); Waterloo Police Dep't, Automated License Plate Readers (ALPRs): Policy 425 (2025) [\[link\]](#); West Des Moines Police Dep't, Automated License Plate Readers (ALPRs) (2025) [\[link\]](#).

<sup>134</sup> See, e.g., Altoona Police Dep't, Automated License Plate Readers (ALPRs): Policy 424 (2024) [\[link\]](#); Ankeny Police Dep't, Automated License Plate Readers (ALPRs): Policy 430 (2025) [\[link\]](#); Bettendorf Police Dep't, Bettendorf Police Directive: License Plate Recognition (LPR) Program (2024) [\[link\]](#); Cedar Rapids Police Dep't, Automated License Plate Recognitions (ALPR) (2024) [\[link\]](#); Coralville Police Dep't, Automated License Plate Readers (ALPRs): Policy 427 (2025) [\[link\]](#); Council Bluffs Police Dep't, Automated License Plate Readers (ALPRs): Policy 427 (2025) [\[link\]](#); City of Dubuque, Safety and Security Camera Acceptable Use Policy: No. 4.23 (2023) [\[link\]](#); Glenwood Police Dep't, Glenwood Police Department's Standard Operating Procedure: Security and LPR Camera Policy (2025) [\[link\]](#); Indianola Police Dep't, License Plate Recognitions (LPR) Systems (2024) [\[link\]](#); Johnston Police Dep't, Automated License Plate Reader (ALPR) (2023) [\[link\]](#); Marshalltown Police Dep't, Automated License Plate Readers (ALPRs): Policy 427 (2025) [\[link\]](#); North Liberty Police Dep't, Automated License Plate Readers (ALPRs): Policy 433 (2024) [\[link\]](#); Pottawattamie County Sheriff's Office, Automated License Plate Readers (ALPRs): Policy 346 (2025) [\[links\]](#); Storm Lake Police Dep't, Automated License Plate Readers (ALPRs): Standard Operating Guidelines 526 (2025)

---

[\[links\]](#); Story County Sheriff's Office, General Order: Automated License Plate Readers (ALPRs) (2024) [\[links\]](#).

<sup>135</sup> See, e.g., Altoona Police Dep't, Automated License Plate Readers (ALPRs): Policy 424 (2024) [\[link\]](#); Ankeny Police Dep't, Automated License Plate Readers (ALPRs): Policy 430 (2025) [\[link\]](#); Bettendorf Police Dep't, Bettendorf Police Directive: License Plate Recognition (LPR) Program (2024) [\[link\]](#); Cedar Rapids Police Dep't, Automated License Plate Recognitions (ALPR) (2024) [\[link\]](#); Clinton Police Dep't, Automated License Plate Readers (ALPRs): Policy 427 (2024) [\[link\]](#); Clive Police Dep't, Police Department Policy and Procedure Manual: License Plate Recognitions (LPR) Systems (2023) [\[link\]](#); Coralville Police Dep't, Automated License Plate Readers (ALPRs): Policy 427 (2025) [\[link\]](#); Council Bluffs Police Dep't, Automated License Plate Readers (ALPRs): Policy 427 (2025) [\[link\]](#); Davenport Police Dep't, License Plate Recognition (LPR) Systems: No. 0625 (2024) [\[link\]](#); City of Dubuque, Safety and Security Camera Acceptable Use Policy: No. 4.23 (2023) [\[link\]](#); Glenwood Police Dep't, Glenwood Police Department's Standard Operating Procedure: Security and LPR Camera Policy (2025) [\[link\]](#); Indianola Police Dep't, License Plate Recognitions (LPR) Systems (2024) [\[link\]](#); Johnson County Sheriff's Office, Automated License Plate Readers (ALPRs) (2024) [\[link\]](#); Johnston Police Dep't, Automated License Plate Reader (ALPR) (2023) [\[link\]](#); Linn County Sheriff's Office, Automated License Plate Readers (ALPRs): Policy 427 (2025) [\[link\]](#); Marion Police Dep't, Operational Policy (2024) [\[link\]](#); Marshalltown Police Dep't, Automated License Plate Readers (ALPRs): Policy 427 (2025) [\[link\]](#); Newton Police Dep't, Automated License Plate Readers (ALPRs): Policy 425 (2025) [\[link\]](#); North Liberty Police Dep't, Automated License Plate Readers (ALPRs): Policy 433 (2024) [\[link\]](#); Oelwein Police Dep't, Automated License Plate Readers (ALPRs): Policy 427 (2025) [\[link\]](#); Pottawattamie County Sheriff's Office, Automated License Plate Readers (ALPRs): Policy 346 (2025) [\[link\]](#); Scott County Sheriff's Office, General Order: Automated License Plate Reader (ALPR) [\[link\]](#); Storm Lake Police Dep't, Automated License Plate Readers (ALPRs): Standard Operating Guidelines 526 (2025) [\[link\]](#); Story County Sheriff's Office, General Order: Automated License Plate Readers (ALPRs) (2024) [\[link\]](#); Urbandale Police Dep't, License Plate Recognition Systems and Traffic Camera Recording System: Policy/Procedure #: 9 [\[link\]](#); Warren County Sheriff's Office, Policy Manual (2024) [\[link\]](#); Waterloo Police Dep't, Automated License Plate Readers (ALPRs): Policy 425 (2025) [\[link\]](#); Waukegan Police Dep't, Written Directive: License Plate Recognition (LPR) Systems (2023) [\[link\]](#); West Des Moines Police Dep't, Automated License Plate Readers (ALPRs) (2025) [\[link\]](#).

<sup>136</sup> See, e.g., Altoona Police Dep't, Automated License Plate Readers (ALPRs): Policy 424 (2024) [\[link\]](#); Ankeny Police Dep't, Automated License Plate Readers (ALPRs): Policy 430 (2025) [\[link\]](#); Bettendorf Police Dep't, Bettendorf Police Directive: License Plate Recognition (LPR) Program (2024) [\[link\]](#); Black Hawk County Sheriff's Office, ALPR Policy and Usage Dashboard (2025) [\[link\]](#); Cedar Rapids Police Dep't, Automated License Plate Recognitions (ALPR) (2024) [\[link\]](#); Clinton Police Dep't, Automated License Plate Readers (ALPRs): Policy 427 (2024) [\[link\]](#); Clive Police Dep't, Police Department Policy and Procedure Manual: License Plate Recognitions (LPR) Systems (2023) [\[link\]](#); Coralville Police Dep't, Automated License Plate Readers (ALPRs): Policy 427 (2025) [\[link\]](#); Council Bluffs Police Dep't, Automated License Plate Readers (ALPRs): Policy 427 (2025) [\[link\]](#); City of Dubuque, Safety and Security Camera Acceptable Use Policy: No. 4.23 (2023) [\[link\]](#); Indianola Police Dep't, License Plate Recognitions (LPR) Systems (2024) [\[link\]](#); Johnson County Sheriff's Office, Automated License Plate Readers (ALPRs) (2024) [\[link\]](#); Johnston Police Dep't, Automated License Plate Reader (ALPR) (2023) [\[link\]](#); Linn County Sheriff's Office, Automated License Plate Readers (ALPRs): Policy 427 (2025) [\[link\]](#); Marion Police Dep't, Operational Policy (2024) [\[link\]](#); Marshalltown Police Dep't, Automated License Plate Readers (ALPRs): Policy 427 (2025) [\[link\]](#); Newton Police Dep't, Automated License Plate Readers (ALPRs): Policy 425 (2025) [\[link\]](#); North Liberty Police Dep't, Automated License Plate Readers (ALPRs): Policy 433 (2024) [\[link\]](#); Oelwein Police Dep't, Automated License Plate Readers (ALPRs): Policy 427 (2025) [\[link\]](#); Pottawattamie County Sheriff's Office, Automated License Plate Readers (ALPRs): Policy 346 (2025) [\[link\]](#); Scott



---

County Sheriff's Office, General Order: Automated License Plate Reader (ALPR) [\[link\]](#); Storm Lake Police Dep't, Automated License Plate Readers (ALPRs): Standard Operating Guidelines 526 (2025) [\[link\]](#); Story County Sheriff's Office, General Order: Automated License Plate Readers (ALPRs) (2024) [\[link\]](#); Urbandale Police Dep't, License Plate Recognition Systems and Traffic Camera Recording System: Policy/Procedure #: 9 [\[link\]](#); Waterloo Police Dep't, Automated License Plate Readers (ALPRs): Policy 425 (2025) [\[link\]](#); West Des Moines Police Dep't, Automated License Plate Readers (ALPRs) (2025) [\[link\]](#).

<sup>137</sup> See, e.g., Altoona Police Dep't, Automated License Plate Readers (ALPRs): Policy 424 (2024) [\[link\]](#); Ankeny Police Dep't, Automated License Plate Readers (ALPRs): Policy 430 (2025) [\[link\]](#); Bettendorf Police Dep't, Bettendorf Police Directive: License Plate Recognition (LPR) Program (2024) [\[link\]](#); Cedar Rapids Police Dep't, Automated License Plate Recognitions (ALPR) (2024) [\[link\]](#); Clinton Police Dep't, Automated License Plate Readers (ALPRs): Policy 427 (2024) [\[link\]](#); Clive Police Dep't, Police Department Policy and Procedure Manual: License Plate Recognitions (LPR) Systems (2023) [\[link\]](#); Coralville Police Dep't, Automated License Plate Readers (ALPRs): Policy 427 (2025) [\[link\]](#); Council Bluffs Police Dep't, Automated License Plate Readers (ALPRs): Policy 427 (2025) [\[link\]](#); Davenport Police Dep't, License Plate Recognition (LPR) Systems: No. 0625 (2024) [\[link\]](#); City of Dubuque, Safety and Security Camera Acceptable Use Policy: No. 4.23 (2023) [\[link\]](#); Glenwood Police Dep't, Glenwood Police Department's Standard Operating Procedure: Security and LPR Camera Policy (2025) [\[link\]](#); Indianola Police Dep't, License Plate Recognitions (LPR) Systems (2024) [\[link\]](#); Johnson County Sheriff's Office, Automated License Plate Readers (ALPRs) (2024) [\[link\]](#); Johnston Police Dep't, Automated License Plate Reader (ALPR) (2023) [\[link\]](#); Linn County Sheriff's Office, Automated License Plate Readers (ALPRs): Policy 427 (2025) [\[link\]](#); Marion Police Dep't, Operational Policy (2024) [\[link\]](#); Marshalltown Police Dep't, Automated License Plate Readers (ALPRs): Policy 427 (2025) [\[link\]](#); Newton Police Dep't, Automated License Plate Readers (ALPRs): Policy 425 (2025) [\[link\]](#); North Liberty Police Dep't, Automated License Plate Readers (ALPRs): Policy 433 (2024) [\[link\]](#); Oelwein Police Dep't, Automated License Plate Readers (ALPRs): Policy 427 (2025) [\[link\]](#); Pottawattamie County Sheriff's Office, Automated License Plate Readers (ALPRs): Policy 346 (2025) [\[link\]](#); Scott County Sheriff's Office, General Order: Automated License Plate Reader (ALPR) [\[link\]](#); Storm Lake Police Dep't, Automated License Plate Readers (ALPRs): Standard Operating Guidelines 526 (2025) [\[link\]](#); Story County Sheriff's Office, General Order: Automated License Plate Readers (ALPRs) (2024) [\[link\]](#); Urbandale Police Dep't, License Plate Recognition Systems and Traffic Camera Recording System: Policy/Procedure #: 9 [\[link\]](#); Warren County Sheriff's Office, Policy Manual (2024) [\[link\]](#); Waterloo Police Dep't, Automated License Plate Readers (ALPRs): Policy 425 (2025) [\[link\]](#); Waukee Police Dep't, Written Directive: License Plate Recognition (LPR) Systems (2023) [\[link\]](#); West Des Moines Police Dep't, Automated License Plate Readers (ALPRs) (2025) [\[link\]](#).

<sup>138</sup> See, e.g., Altoona Police Dep't, Automated License Plate Readers (ALPRs): Policy 424 (2024) [\[link\]](#); Ankeny Police Dep't, Automated License Plate Readers (ALPRs): Policy 430 (2025) [\[link\]](#); Bettendorf Police Dep't, Bettendorf Police Directive: License Plate Recognition (LPR) Program (2024) [\[link\]](#); Cedar Rapids Police Dep't, Automated License Plate Recognitions (ALPR) (2024) [\[link\]](#); Clinton Police Dep't, Automated License Plate Readers (ALPRs): Policy 427 (2024) [\[link\]](#); Clive Police Dep't, Police Department Policy and Procedure Manual: License Plate Recognitions (LPR) Systems (2023) [\[link\]](#); Coralville Police Dep't, Automated License Plate Readers (ALPRs): Policy 427 (2025) [\[link\]](#); Council Bluffs Police Dep't, Automated License Plate Readers (ALPRs): Policy 427 (2025) [\[link\]](#); Davenport Police Dep't, License Plate Recognition (LPR) Systems: No. 0625 (2024) [\[link\]](#); City of Dubuque, Safety and Security Camera Acceptable Use Policy: No. 4.23 (2023) [\[link\]](#); Indianola Police Dep't, License Plate Recognitions (LPR) Systems (2024) [\[link\]](#); Johnson County Sheriff's Office, Automated License Plate Readers (ALPRs) (2024) [\[link\]](#); Johnston Police Dep't, Automated License Plate Reader (ALPR) (2023) [\[link\]](#); Linn County Sheriff's Office, Automated License Plate Readers (ALPRs): Policy 427 (2025) [\[link\]](#); Marion Police Dep't, Operational Policy (2024) [\[link\]](#);

---

Marshalltown Police Dep't, Automated License Plate Readers (ALPRs): Policy 427 (2025) [\[link\]](#); Newton Police Dep't, Automated License Plate Readers (ALPRs): Policy 425 (2025) [\[link\]](#); North Liberty Police Dep't, Automated License Plate Readers (ALPRs): Policy 433 (2024) [\[link\]](#); Oelwein Police Dep't, Automated License Plate Readers (ALPRs): Policy 427 (2025) [\[link\]](#); Pottawattamie County Sheriff's Office, Automated License Plate Readers (ALPRs): Policy 346 (2025) [\[link\]](#); Scott County Sheriff's Office, General Order: Automated License Plate Reader (ALPR) [\[link\]](#); Storm Lake Police Dep't, Automated License Plate Readers (ALPRs): Standard Operating Guidelines 526 (2025) [\[link\]](#); Urbandale Police Dep't, License Plate Recognition Systems and Traffic Camera Recording System: Policy/Procedure #: 9 [\[link\]](#); Warren County Sheriff's Office, Policy Manual (2024) [\[link\]](#); Waterloo Police Dep't, Automated License Plate Readers (ALPRs): Policy 425 (2025) [\[link\]](#); Waukee Police Dep't, Written Directive: License Plate Recognition (LPR) Systems (2023) [\[link\]](#); West Des Moines Police Dep't, Automated License Plate Readers (ALPRs) (2025) [\[link\]](#).

<sup>139</sup> See, e.g., Altoona Police Dep't, Automated License Plate Readers (ALPRs): Policy 424 (2024) [\[link\]](#); Ankeny Police Dep't, Automated License Plate Readers (ALPRs): Policy 430 (2025) [\[link\]](#); Bettendorf Police Dep't, Bettendorf Police Directive: License Plate Recognition (LPR) Program (2024) [\[link\]](#); Cedar Rapids Police Dep't, Automated License Plate Recognitions (ALPR) (2024) [\[link\]](#); Clinton Police Dep't, Automated License Plate Readers (ALPRs): Policy 427 (2024) [\[link\]](#); Clive Police Dep't, Police Department Policy and Procedure Manual: License Plate Recognitions (LPR) Systems (2023) [\[link\]](#); Coralville Police Dep't, Automated License Plate Readers (ALPRs): Policy 427 (2025) [\[link\]](#); Council Bluffs Police Dep't, Automated License Plate Readers (ALPRs): Policy 427 (2025) [\[link\]](#); Davenport Police Dep't, License Plate Recognition (LPR) Systems: No. 0625 (2024) [\[link\]](#); City of Dubuque, Safety and Security Camera Acceptable Use Policy: No. 4.23 (2023) [\[link\]](#); Indianola Police Dep't, License Plate Recognitions (LPR) Systems (2024) [\[link\]](#); Johnson County Sheriff's Office, Automated License Plate Readers (ALPRs) (2024) [\[link\]](#); Johnston Police Dep't, Automated License Plate Reader (ALPR) (2023) [\[link\]](#); Linn County Sheriff's Office, Automated License Plate Readers (ALPRs): Policy 427 (2025) [\[link\]](#); Marshalltown Police Dep't, Automated License Plate Readers (ALPRs): Policy 427 (2025) [\[link\]](#); Newton Police Dep't, Automated License Plate Readers (ALPRs): Policy 425 (2025) [\[link\]](#); North Liberty Police Dep't, Automated License Plate Readers (ALPRs): Policy 433 (2024) [\[link\]](#); Oelwein Police Dep't, Automated License Plate Readers (ALPRs): Policy 427 (2025) [\[link\]](#); Pottawattamie County Sheriff's Office, Automated License Plate Readers (ALPRs): Policy 346 (2025) [\[link\]](#); Storm Lake Police Dep't, Automated License Plate Readers (ALPRs): Standard Operating Guidelines 526 (2025) [\[link\]](#); Story County Sheriff's Office, General Order: Automated License Plate Readers (ALPRs) (2024) [\[link\]](#); Urbandale Police Dep't, License Plate Recognition Systems and Traffic Camera Recording System: Policy/Procedure #: 9 [\[link\]](#); Warren County Sheriff's Office, Policy Manual (2024) [\[link\]](#); Waterloo Police Dep't, Automated License Plate Readers (ALPRs): Policy 425 (2025) [\[link\]](#); Waukee Police Dep't, Written Directive: License Plate Recognition (LPR) Systems (2023) [\[link\]](#); West Des Moines Police Dep't, Automated License Plate Readers (ALPRs) (2025) [\[link\]](#).

<sup>140</sup> See, e.g., Altoona Police Dep't, Automated License Plate Readers (ALPRs): Policy 424 (2024) [\[link\]](#); Ankeny Police Dep't, Automated License Plate Readers (ALPRs): Policy 430 (2025) [\[link\]](#); Cedar Rapids Police Dep't, Automated License Plate Recognitions (ALPR) (2024) [\[link\]](#); Clinton Police Dep't, Automated License Plate Readers (ALPRs): Policy 427 (2024) [\[link\]](#); Coralville Police Dep't, Automated License Plate Readers (ALPRs): Policy 427 (2025) [\[link\]](#); Council Bluffs Police Dep't, Automated License Plate Readers (ALPRs): Policy 427 (2025) [\[link\]](#); City of Dubuque, Safety and Security Camera Acceptable Use Policy: No. 4.23 (2023) [\[link\]](#); Johnson County Sheriff's Office, Automated License Plate Readers (ALPRs) (2024) [\[link\]](#); Linn County Sheriff's Office, Automated License Plate Readers (ALPRs): Policy 427 (2025) [\[link\]](#); Marshalltown Police Dep't, Automated License Plate Readers (ALPRs): Policy 427 (2025) [\[link\]](#); Newton Police Dep't, Automated License Plate Readers (ALPRs): Policy 425 (2025) [\[link\]](#); North Liberty Police Dep't, Automated License Plate Readers (ALPRs): Policy 433 (2024) [\[link\]](#); Oelwein Police Dep't, Automated License Plate Readers

---

(ALPRs): Policy 427 (2025) [\[link\]](#); Pottawattamie County Sheriff's Office, Automated License Plate Readers (ALPRs): Policy 346 (2025) [\[link\]](#); Storm Lake Police Dep't, Automated License Plate Readers (ALPRs): Standard Operating Guidelines 526 (2025) [\[link\]](#); Waterloo Police Dep't, Automated License Plate Readers (ALPRs): Policy 425 (2025) [\[link\]](#); West Des Moines Police Dep't, Automated License Plate Readers (ALPRs) (2025) [\[link\]](#).

<sup>141</sup> See, e.g., Altoona Police Dep't, Automated License Plate Readers (ALPRs): Policy 424 (2024) [\[link\]](#); Ankeny Police Dep't, Automated License Plate Readers (ALPRs): Policy 430 (2025) [\[link\]](#); Bettendorf Police Dep't, Bettendorf Police Directive: License Plate Recognition (LPR) Program (2024) [\[link\]](#); Cedar Rapids Police Dep't, Automated License Plate Recognitions (ALPR) (2024) [\[link\]](#); Clinton Police Dep't, Automated License Plate Readers (ALPRs): Policy 427 (2024) [\[link\]](#); Clive Police Dep't, Police Department Policy and Procedure Manual: License Plate Recognitions (LPR) Systems (2023) [\[link\]](#); Coralville Police Dep't, Automated License Plate Readers (ALPRs): Policy 427 (2025) [\[link\]](#); Council Bluffs Police Dep't, Automated License Plate Readers (ALPRs): Policy 427 (2025) [\[link\]](#); City of Dubuque, Safety and Security Camera Acceptable Use Policy: No. 4.23 (2023) [\[link\]](#); Indianola Police Dep't, License Plate Recognitions (LPR) Systems (2024) [\[link\]](#); Johnson County Sheriff's Office, Automated License Plate Readers (ALPRs) (2024) [\[link\]](#); Johnston Police Dep't, Automated License Plate Reader (ALPR) (2023) [\[link\]](#); Linn County Sheriff's Office, Automated License Plate Readers (ALPRs): Policy 427 (2025) [\[link\]](#); Marion Police Dep't, Operational Policy (2024) [\[link\]](#); Marshalltown Police Dep't, Automated License Plate Readers (ALPRs): Policy 427 (2025) [\[link\]](#); Newton Police Dep't, Automated License Plate Readers (ALPRs): Policy 425 (2025) [\[link\]](#); North Liberty Police Dep't, Automated License Plate Readers (ALPRs): Policy 433 (2024) [\[link\]](#); Oelwein Police Dep't, Automated License Plate Readers (ALPRs): Policy 427 (2025) [\[link\]](#); Scott County Sheriff's Office, General Order: Automated License Plate Reader (ALPR) [\[link\]](#); Storm Lake Police Dep't, Automated License Plate Readers (ALPRs): Standard Operating Guidelines 526 (2025) [\[link\]](#); Story County Sheriff's Office, General Order: Automated License Plate Readers (ALPRs) (2024) [\[link\]](#); Urbandale Police Dep't, License Plate Recognition Systems and Traffic Camera Recording System: Policy/Procedure #: 9 [\[link\]](#); Warren County Sheriff's Office, Policy Manual (2024) [\[link\]](#); Waterloo Police Dep't, Automated License Plate Readers (ALPRs): Policy 425 (2025) [\[link\]](#).

<sup>142</sup> See, e.g., Altoona Police Dep't, Automated License Plate Readers (ALPRs): Policy 424 (2024) [\[link\]](#); Ankeny Police Dep't, Automated License Plate Readers (ALPRs): Policy 430 (2025) [\[link\]](#); Bettendorf Police Dep't, Bettendorf Police Directive: License Plate Recognition (LPR) Program (2024) [\[link\]](#); Clinton Police Dep't, Automated License Plate Readers (ALPRs): Policy 427 (2024) [\[link\]](#); Clive Police Dep't, Police Department Policy and Procedure Manual: License Plate Recognitions (LPR) Systems (2023) [\[link\]](#); Coralville Police Dep't, Automated License Plate Readers (ALPRs): Policy 427 (2025) [\[link\]](#); Council Bluffs Police Dep't, Automated License Plate Readers (ALPRs): Policy 427 (2025) [\[link\]](#); Davenport Police Dep't, License Plate Recognition (LPR) Systems: No. 0625 (2024) [\[link\]](#); Indianola Police Dep't, License Plate Recognitions (LPR) Systems (2024) [\[link\]](#); Johnson County Sheriff's Office, Automated License Plate Readers (ALPRs) (2024) [\[link\]](#); Johnston Police Dep't, Automated License Plate Reader (ALPR) (2023) [\[link\]](#); Linn County Sheriff's Office, Automated License Plate Readers (ALPRs): Policy 427 (2025) [\[link\]](#); Marshalltown Police Dep't, Automated License Plate Readers (ALPRs): Policy 427 (2025) [\[link\]](#); Newton Police Dep't, Automated License Plate Readers (ALPRs): Policy 425 (2025) [\[link\]](#); North Liberty Police Dep't, Automated License Plate Readers (ALPRs): Policy 433 (2024) [\[link\]](#); Oelwein Police Dep't, Automated License Plate Readers (ALPRs): Policy 427 (2025) [\[link\]](#); Scott County Sheriff's Office, General Order: Automated License Plate Reader (ALPR) [\[link\]](#); Storm Lake Police Dep't, Automated License Plate Readers (ALPRs): Standard Operating Guidelines 526 (2025) [\[link\]](#); Story County Sheriff's Office, General Order: Automated License Plate Readers (ALPRs) (2024) [\[link\]](#); Urbandale Police Dep't, License Plate Recognition Systems and Traffic Camera Recording System: Policy/Procedure #: 9 [\[link\]](#); Warren County Sheriff's Office, Policy Manual (2024) [\[link\]](#); Waterloo Police Dep't, Automated License Plate Readers (ALPRs): Policy 425 (2025) [\[link\]](#); Waukegan Police Dep't, Written Directive: License Plate



---

Recognition (LPR) Systems (2023) [\[link\]](#); West Des Moines Police Dep't, Automated License Plate Readers (ALPRs) (2025) [\[link\]](#).

<sup>143</sup> See, e.g., Altoona Police Dep't, Automated License Plate Readers (ALPRs): Policy 424 (2024) [\[link\]](#); Ankeny Police Dep't, Automated License Plate Readers (ALPRs): Policy 430 (2025) [\[link\]](#); Clinton Police Dep't, Automated License Plate Readers (ALPRs): Policy 427 (2024) [\[link\]](#); Coralville Police Dep't, Automated License Plate Readers (ALPRs): Policy 427 (2025) [\[link\]](#); Council Bluffs Police Dep't, Automated License Plate Readers (ALPRs): Policy 427 (2025) [\[link\]](#); Davenport Police Dep't, License Plate Recognition (LPR) Systems: No. 0625 (2024) [\[link\]](#); Indianola Police Dep't, License Plate Recognitions (LPR) Systems (2024) [\[link\]](#); Johnson County Sheriff's Office, Automated License Plate Readers (ALPRs) (2024) [\[link\]](#); Johnston Police Dep't, Automated License Plate Reader (ALPR) (2023) [\[link\]](#); Linn County Sheriff's Office, Automated License Plate Readers (ALPRs): Policy 427 (2025) [\[link\]](#); Marshalltown Police Dep't, Automated License Plate Readers (ALPRs): Policy 427 (2025) [\[link\]](#); Newton Police Dep't, Automated License Plate Readers (ALPRs): Policy 425 (2025) [\[link\]](#); North Liberty Police Dep't, Automated License Plate Readers (ALPRs): Policy 433 (2024) [\[link\]](#); Oelwein Police Dep't, Automated License Plate Readers (ALPRs): Policy 427 (2025) [\[link\]](#); Storm Lake Police Dep't, Automated License Plate Readers (ALPRs): Standard Operating Guidelines 526 (2025) [\[link\]](#); Story County Sheriff's Office, General Order: Automated License Plate Readers (ALPRs) (2024) [\[link\]](#); Waterloo Police Dep't, Automated License Plate Readers (ALPRs): Policy 425 (2025) [\[link\]](#); Waukeg Police Dep't, Written Directive: License Plate Recognition (LPR) Systems (2023) [\[link\]](#); West Des Moines Police Dep't, Automated License Plate Readers (ALPRs) (2025) [\[link\]](#).

<sup>144</sup> See, e.g., Altoona Police Dep't, Automated License Plate Readers (ALPRs): Policy 424 (2024) [\[link\]](#); Ankeny Police Dep't, Automated License Plate Readers (ALPRs): Policy 430 (2025) [\[link\]](#); Clinton Police Dep't, Automated License Plate Readers (ALPRs): Policy 427 (2024) [\[link\]](#); Coralville Police Dep't, Automated License Plate Readers (ALPRs): Policy 427 (2025) [\[link\]](#); Council Bluffs Police Dep't, Automated License Plate Readers (ALPRs): Policy 427 (2025) [\[link\]](#); Davenport Police Dep't, License Plate Recognition (LPR) Systems: No. 0625 (2024) [\[link\]](#); Indianola Police Dep't, License Plate Recognitions (LPR) Systems (2024) [\[link\]](#); Johnson County Sheriff's Office, Automated License Plate Readers (ALPRs) (2024) [\[link\]](#); Johnston Police Dep't, Automated License Plate Reader (ALPR) (2023) [\[link\]](#); Linn County Sheriff's Office, Automated License Plate Readers (ALPRs): Policy 427 (2025) [\[link\]](#); Marshalltown Police Dep't, Automated License Plate Readers (ALPRs): Policy 427 (2025) [\[link\]](#); Newton Police Dep't, Automated License Plate Readers (ALPRs): Policy 425 (2025) [\[link\]](#); North Liberty Police Dep't, Automated License Plate Readers (ALPRs): Policy 433 (2024) [\[link\]](#); Oelwein Police Dep't, Automated License Plate Readers (ALPRs): Policy 427 (2025) [\[link\]](#); Storm Lake Police Dep't, Automated License Plate Readers (ALPRs): Standard Operating Guidelines 526 (2025) [\[link\]](#); Story County Sheriff's Office, General Order: Automated License Plate Readers (ALPRs) (2024) [\[link\]](#); Waterloo Police Dep't, Automated License Plate Readers (ALPRs): Policy 425 (2025) [\[link\]](#); Waukeg Police Dep't, Written Directive: License Plate Recognition (LPR) Systems (2023) [\[link\]](#); West Des Moines Police Dep't, Automated License Plate Readers (ALPRs) (2025) [\[link\]](#).

<sup>145</sup> See, e.g., Bettendorf Police Dep't, Bettendorf Police Directive: License Plate Recognition (LPR) Program (2024) [\[link\]](#); Clive Police Dep't, Police Department Policy and Procedure Manual: License Plate Recognitions (LPR) Systems (2023) [\[link\]](#); Urbandale Police Dep't, License Plate Recognition Systems and Traffic Camera Recording System: Policy/Procedure #: 9 [\[link\]](#).

<sup>146</sup> Contract between the Clive Police Department and Flock Safety (Dec. 12, 2022) [\[link\]](#).

<sup>147</sup> Ankeny Police Dep't, Automated License Plate Readers (ALPRs): Policy 430 (2025) [\[link\]](#).

<sup>148</sup> Alex Harrison, *Evanston Shuts Down License Plate Cameras, Terminates Contract with Flock Safety*, Evanston RoundTable (Aug. 26, 2025), <https://evanstonroundtable.com/2025/08/26/evanston-shuts-down-license-plate-cameras-terminates-contract-with-flock-safety> [\[https://perma.cc/7VZK-4TQA\]](https://perma.cc/7VZK-4TQA).

---

<sup>149</sup> Alex Harrison, *Evanston Shuts Down License Plate Cameras, Terminates Contract with Flock Safety*, Evanston RoundTable (Aug. 26, 2025), <https://evanstonroundtable.com/2025/08/26/evanston-shuts-down-license-plate-cameras-terminates-contract-with-flock-safety> [<https://perma.cc/7VZK-4TQA>].

<sup>150</sup> Alex Harrison, *City Sends Cease-and-Desist after Flock Reinstalls License Plate Cameras*, Evanston RoundTable (Sept. 24, 2025), <https://evanstonroundtable.com/2025/09/24/flock-safety-reinstalls-evanston-cameras> [<https://perma.cc/VNW2-BVQR>].

<sup>151</sup> See Appendix C of this report.

<sup>152</sup> See Appendix C of this report.

<sup>153</sup> See Appendix C of this report.

<sup>154</sup> See Appendix C of this report.

<sup>155</sup> See Appendix C of this report.

<sup>156</sup> See Appendix C of this report.

<sup>157</sup> Ultimately, the clinic identified 19 Flock transparency portals and 1 for Axon. Of the 19 Flock portals, 15 are for law enforcement agencies we sent requests to, while the other 4 were found through independent research.

<sup>158</sup> See e.g., *See, e.g., Altoona IA PD Transparency Portal*, Flock Safety (Nov. 14, 2025), <https://transparency.flocksafety.com/altoona-ia-pd> [<https://perma.cc/HP44-QPKK>]; *Cedar Rapids IA PD Transparency Portal*, Flock Safety (Nov. 14, 2025), <https://transparency.flocksafety.com/cedar-rapids-ia-pd> [<https://perma.cc/X87S-W5DJ>]; *Clinton IA PD Transparency Portal*, Flock Safety (Nov. 14, 2025), <https://transparency.flocksafety.com/clinton-ia-pd> [<https://perma.cc/SB4W-E6R5>]; *Clive IA PD Transparency Portal*, Flock Safety (Nov. 20, 2025), <https://transparency.flocksafety.com/clive-ia-pd> [<https://perma.cc/R2BG-DD5N>]; *Coralville IA PD Transparency Portal*, Flock Safety (Nov. 14, 2025), <https://transparency.flocksafety.com/coralville-ia-pd> [<https://perma.cc/U3Q7-THCS>]; *Council Bluffs IA PD Transparency Portal*, Flock Safety (Nov. 14, 2025), <https://transparency.flocksafety.com/council-bluffs-ia-pd> [<https://perma.cc/5BGQ-VGPX>]; *Davenport IA PD Transparency Portal*, Flock Safety (Nov. 14, 2025), <https://transparency.flocksafety.com/davenport-ia-pd> [<https://perma.cc/C56J-RHDM>]; *Dubuque IA PD Transparency Portal*, Flock Safety (Nov. 14, 2025), <https://transparency.flocksafety.com/dubuque-ia-pd> [<https://perma.cc/5NWJ-5YKP>]; *Indianola IA PD Transparency Portal*, Flock Safety (Nov. 14, 2025), <https://transparency.flocksafety.com/indianola-ia-pd> [<https://perma.cc/K9G3-EANM>]; *Johnston IA PD Transparency Portal*, Flock Safety (Nov. 14, 2025), <https://transparency.flocksafety.com/johnston-ia-pd> [<https://perma.cc/T4HY-BVCE>]; *North Liberty IA PD Transparency Portal*, Flock Safety (Nov. 14, 2025), <https://transparency.flocksafety.com/north-liberty-ia-pd> [<https://perma.cc/MU6Y-SVEU>]; *Burlington IA PD Transparency Portal*, Flock Safety (Nov. 14, 2025), <https://transparency.flocksafety.com/burlington-ia-pd> [<https://perma.cc/RC7X-J6GE>]; *Carlisle IA PD Transparency Portal*, Flock Safety (Nov. 14, 2025), <https://transparency.flocksafety.com/carlisle-ia-pd> [<https://perma.cc/HZ5K-VLJW>]; *Polk County Conservation IA Transparency Portal*, Flock Safety (Nov. 14, 2025), <https://transparency.flocksafety.com/polk-county-conservation-ia> [<https://perma.cc/YUL8-BYJE>]; *University of Iowa PD (IA) Transparency Portal*, Flock Safety (Nov. 14, 2025), <https://transparency.flocksafety.com/university-of-iowa-pd-ia> [<https://perma.cc/5NXD-VLB5>]; *IA – Storm Lake PD Transparency Portal*, Flock Safety (Nov. 14, 2025), <https://transparency.flocksafety.com/ia-storm-lake-pd> [<https://perma.cc/2XWH-FJLW>]; *Story County IA SO Transparency Portal*, Flock Safety (Nov. 14, 2025), <https://transparency.flocksafety.com/story-county-ia-so> [<https://perma.cc/NK3V-4E6J>]; *Urbandale IA PD Transparency Portal*, Flock Safety (Nov. 14, 2025), <https://transparency.flocksafety.com/urbandale-ia-pd> [[57](https://perma.cc/M7Q4-</a></p></div><div data-bbox=)

---

[PEM5](#)]; *West Des Moines IA PD Transparency Portal*, Flock Safety (Nov. 14, 2025), <https://transparency.flocksafety.com/west-des-moines-ia-pd> [<https://perma.cc/JA2A-X28T>].

<sup>159</sup> The reasonings as to why these types of records varied by agency. Most often they were claimed confidential under 22.7(50), as “intelligence data” and under 22.7(5) for being “investigative in nature.”

<sup>160</sup> See Appendix C of this report.

<sup>161</sup> See Appendix C of this report.

<sup>162</sup> See Appendix C of this report.

<sup>163</sup> See Appendix C of this report.

<sup>164</sup> *ALPR Search Logs*, Clive Police Dep’t (Oct. 14, 2025), [[link](#)]; *ALPR Search Logs*, Clive Police Dep’t (Dec. 8, 2025), [[link](#)].

<sup>165</sup> *ALPR Search Logs*, Council Bluffs Police Dep’t (Dec. 8, 2025, [[link](#)].

<sup>166</sup> Jay Stanley, *Surveillance Supporters Tout Police Audit Logs But They’re Not an Effective Check and Balance*, ACLU (Oct. 31, 2025), <https://www.aclu.org/news/privacy-technology/police-audit-logs> [<https://perma.cc/E3KT-C9YV>].

<sup>167</sup> Flock makes transparency portals available for free to its customers. See *Stop Crime in Its Tracks with Evidence that Drives Action*, Flock Safety, <https://www.flocksafety.com/products/license-plate-readers> [<https://perma.cc/U6C2-8LVH>].

<sup>168</sup> See e.g., *Altoona IA PD Transparency Portal*, Flock Safety (Nov. 14, 2025), <https://transparency.flocksafety.com/altoona-ia-pd> [<https://perma.cc/HP44-QPKK>]; *Cedar Rapids IA PD Transparency Portal*, Flock Safety (Nov. 14, 2025), <https://transparency.flocksafety.com/cedar-rapids-ia-pd> [<https://perma.cc/X87S-W5DJ>]; *Clinton IA PD Transparency Portal*, Flock Safety (Nov. 14, 2025), <https://transparency.flocksafety.com/clinton-ia-pd> [<https://perma.cc/SB4W-E6R5>]; *Clive IA PD Transparency Portal*, Flock Safety (Nov. 20, 2025), <https://transparency.flocksafety.com/clive-ia-pd> [<https://perma.cc/R2BG-DD5N>]; *Coralville IA PD Transparency Portal*, Flock Safety (Nov. 14, 2025), <https://transparency.flocksafety.com/coralville-ia-pd> [<https://perma.cc/U3Q7-THCS>]; *Council Bluffs IA PD Transparency Portal*, Flock Safety (Nov. 14, 2025), <https://transparency.flocksafety.com/council-bluffs-ia-pd> [<https://perma.cc/5BGQ-VGPX>]; *Davenport IA PD Transparency Portal*, Flock Safety (Nov. 14, 2025), <https://transparency.flocksafety.com/davenport-ia-pd> [<https://perma.cc/C56J-RHDM>]; *Dubuque IA PD Transparency Portal*, Flock Safety (Nov. 14, 2025), <https://transparency.flocksafety.com/dubuque-ia-pd> [<https://perma.cc/5NWJ-5YKP>]; *Indianola IA PD Transparency Portal*, Flock Safety (Nov. 14, 2025), <https://transparency.flocksafety.com/indianola-ia-pd> [<https://perma.cc/K9G3-EANM>]; *Johnston IA PD Transparency Portal*, Flock Safety (Nov. 14, 2025), <https://transparency.flocksafety.com/johnston-ia-pd> [<https://perma.cc/T4HY-BVCE>]; *Marion Police Department - IA*, Axon (Nov. 21, 2025), <https://marionpdia.evidence.com/alpr/public/policy> [<https://perma.cc/XAJ3-N2Y3>]; *North Liberty IA PD Transparency Portal*, Flock Safety (Nov. 14, 2025), <https://transparency.flocksafety.com/north-liberty-ia-pd> [<https://perma.cc/MU6Y-SVEU>]; *Burlington IA PD Transparency Portal*, Flock Safety (Nov. 14, 2025), <https://transparency.flocksafety.com/burlington-ia-pd> [<https://perma.cc/RC7X-J6GE>]; *Carlisle IA PD Transparency Portal*, Flock Safety (Nov. 14, 2025), <https://transparency.flocksafety.com/carlisle-ia-pd> [<https://perma.cc/HZ5K-VLJW>]; *Polk County Conservation IA Transparency Portal*, Flock Safety (Nov. 14, 2025), <https://transparency.flocksafety.com/polk-county-conservation-ia> [<https://perma.cc/YUL8-BYJE>]; *University of Iowa PD (IA) Transparency Portal*, Flock Safety (Nov. 14, 2025), <https://transparency.flocksafety.com/university-of-iowa-pd-ia> [<https://perma.cc/5NXD-VLB5>]; *IA – Storm Lake PD Transparency Portal*, Flock Safety (Nov. 14, 2025),

---

<https://transparency.flocksafety.com/ia-storm-lake-pd> [https://perma.cc/2XWH-FJLW]; *Story County IA SO Transparency Portal*, Flock Safety (Nov. 14, 2025), <https://transparency.flocksafety.com/story-county-ia-so> [https://perma.cc/NK3V-4E6J]; *Urbandale IA PD Transparency Portal*, Flock Safety (Nov. 14, 2025), <https://transparency.flocksafety.com/urbandale-ia-pd> [https://perma.cc/M7Q4-PEM5]; *West Des Moines IA PD Transparency Portal*, Flock Safety (Nov. 14, 2025), <https://transparency.flocksafety.com/west-des-moines-ia-pd> [https://perma.cc/JA2A-X28T].

<sup>169</sup> See e.g., *See, e.g., Cedar Rapids IA PD Transparency Portal*, Flock Safety (Nov. 3, 2025), <https://transparency.flocksafety.com/cedar-rapids-ia-pd> [https://perma.cc/X87S-W5DJ]; *Clinton IA PD Transparency Portal*, Flock Safety (Nov. 3, 2025), <https://transparency.flocksafety.com/clinton-ia-pd> [https://perma.cc/SB4W-E6R5]; *Clive IA PD Transparency Portal*, Flock Safety (Nov. 20, 2025), <https://transparency.flocksafety.com/clive-ia-pd> [https://perma.cc/R2BG-DD5N]; *Council Bluffs IA PD Transparency Portal*, Flock Safety (Nov. 3, 2025), <https://transparency.flocksafety.com/council-bluffs-ia-pd> [https://perma.cc/5BGQ-VGPX]; *Davenport IA PD Transparency Portal*, Flock Safety (Nov. 3, 2025), <https://transparency.flocksafety.com/davenport-ia-pd> [https://perma.cc/C56J-RHDM]; *Indianola IA PD Transparency Portal*, Flock Safety (Nov. 3, 2025), <https://transparency.flocksafety.com/indianola-ia-pd> [https://perma.cc/K9G3-EANM]; *Carlisle IA PD Transparency Portal*, Flock Safety (Nov. 3, 2025), <https://transparency.flocksafety.com/carlisle-ia-pd> [https://perma.cc/HZ5K-VLJW]; *Polk County Conservation IA Transparency Portal*, Flock Safety (Nov. 3, 2025), <https://transparency.flocksafety.com/polk-county-conservation-ia> [https://perma.cc/YUL8-BYJE]; *University of Iowa PD (IA) Transparency Portal*, Flock Safety (Nov. 3, 2025), <https://transparency.flocksafety.com/university-of-iowa-pd-ia> [https://perma.cc/5NXD-VLB5]; *Story County IA SO Transparency Portal*, Flock Safety (Nov. 3, 2025), <https://transparency.flocksafety.com/story-county-ia-so> [https://perma.cc/NK3V-4E6J]; *Urbandale IA PD Transparency Portal*, Flock Safety (Nov. 3, 2025), <https://transparency.flocksafety.com/urbandale-ia-pd> [https://perma.cc/M7Q4-PEM5]; *West Des Moines IA PD Transparency Portal*, Flock Safety (Nov. 3, 2025), <https://transparency.flocksafety.com/west-des-moines-ia-pd> [https://perma.cc/JA2A-X28T].

<sup>170</sup> See e.g., *Clinton IA PD Transparency Portal*, Flock Safety (Nov. 14, 2025), <https://transparency.flocksafety.com/clinton-ia-pd> [https://perma.cc/SB4W-E6R5]; *Clive IA PD Transparency Portal*, Flock Safety (Nov. 20, 2025), <https://transparency.flocksafety.com/clive-ia-pd> [https://perma.cc/R2BG-DD5N]; *Coralville IA PD Transparency Portal*, Flock Safety (Nov. 14, 2025), <https://transparency.flocksafety.com/coralville-ia-pd> [https://perma.cc/U3Q7-THCS]; *Council Bluffs IA PD Transparency Portal*, Flock Safety (Nov. 14, 2025), <https://transparency.flocksafety.com/council-bluffs-ia-pd> [https://perma.cc/5BGQ-VGPX]; *Davenport IA PD Transparency Portal*, Flock Safety (Nov. 14, 2025), <https://transparency.flocksafety.com/davenport-ia-pd> [https://perma.cc/C56J-RHDM]; *Dubuque IA PD Transparency Portal*, Flock Safety (Nov. 14, 2025), <https://transparency.flocksafety.com/dubuque-ia-pd> [https://perma.cc/5NWJ-5YKP]; *Indianola IA PD Transparency Portal*, Flock Safety (Nov. 14, 2025), <https://transparency.flocksafety.com/indianola-ia-pd> [https://perma.cc/K9G3-EANM]; *North Liberty IA PD Transparency Portal*, Flock Safety (Nov. 14, 2025), <https://transparency.flocksafety.com/north-liberty-ia-pd> [https://perma.cc/MU6Y-SVEU]; *Carlisle IA PD Transparency Portal*, Flock Safety (Nov. 14, 2025), <https://transparency.flocksafety.com/carlisle-ia-pd> [https://perma.cc/HZ5K-VLJW]; *Polk County Conservation IA Transparency Portal*, Flock Safety (Nov. 14, 2025), <https://transparency.flocksafety.com/polk-county-conservation-ia> [https://perma.cc/YUL8-BYJE]; *University of Iowa PD (IA) Transparency Portal*, Flock Safety (Nov. 14, 2025), <https://transparency.flocksafety.com/university-of-iowa-pd-ia> [https://perma.cc/5NXD-VLB5]; *Story County IA SO Transparency Portal*, Flock Safety (Nov. 14, 2025), <https://transparency.flocksafety.com/story-county-ia-so> [https://perma.cc/NK3V-4E6J]; *Urbandale IA PD Transparency Portal*, Flock Safety (Nov. 14, 2025), <https://transparency.flocksafety.com/urbandale-ia-pd> [https://perma.cc/M7Q4-PEM5]; *West Des*



---

*Moines IA PD Transparency Portal*, Flock Safety (Nov. 14, 2025), <https://transparency.flocksafety.com/west-des-moines-ia-pd> [<https://perma.cc/JA2A-X28T>].

<sup>171</sup> Story County Sheriff, Axon Erroneous Hotlist Hit.

<sup>172</sup> See e.g., E-mail from Lyndsey Seifert, Records Bureau Supervisor, to Law Legal Clinic (Sept. 17, 2025 04:55 PM CT) (on file with ACLU of Iowa) [[link](#)]; E-mail from Rachel Bolender, Marion Police Department, City Clerk to Law Legal Clinic (Sept. 15, 2025 03:36 PM CT) (same) [[link](#)].

<sup>173</sup> See e.g., E-mail from Major Dan Walter, Ames Police Department to Law Legal Clinic (Sept. 26, 2025 11:00 am CT) (on file with ACLU of Iowa) [[link](#)]; E-mail from Lyndsey Seifert, Records Bureau Supervisor, to Law Legal Clinic (Sept. 17, 2025 04:55 PM CT) (same) [[link](#)]; E-mail from Rachel Bolender, Marion Police Department, City Clerk to Law Legal Clinic (Sept. 15, 2025 03:36 PM CT) (same) [[link](#)]; E-mail from Mayra Martinez City of Storm Lake, City Clerk to Law Legal Clinic (Sept. 15, 2025 04:03 PM CT) (same) [[link](#)].

<sup>174</sup> Altoona Police Dep't, Flock Safety Training Guide [[link](#)]; Black Hawk County Sheriff's Office, Axon Fleet 3 ALPR User Guide (rev. July 29, 2025) [[link](#)]; Indianola Police Dep't, Flock Safety User Guide: Steps to Use Flock Safety Tools (last updated Feb. 7, 2020) [[link](#)]; Iowa City, Genetec Patroller™ Administrator Guide 6.6 (last updated Apr. 22, 2022) [[link](#)]; Marshall County Sheriff's Office, Training Materials (folder with various training materials) [[link](#)]; Marshalltown Police Dep't, Flock Safety, Customer Implementation Guide Law Enforcement [[link](#)]; Scott County Sheriff's Office, Vigilant PlateSearch User Guide [[link](#)]; Urbandale Police Dep't, Initial Training and Orientation (2023) [[link](#)]. Davenport Police Department and Newtown Police Department claimed that training materials were confidential. See E-mail from Lyndsey Seifert, Records Bureau Supervisor, to Law Legal Clinic (Sept. 17, 2025 04:55 PM CT) (on file with ACLU of Iowa) [[link](#)]; E-mail from Mandi Lamb, Administrative Assistant, to Law Legal Clinic (Sept. 18, 2025 08:23 AM CT) (on file with ACLU of Iowa) [[link](#)].

<sup>175</sup> See E-mail from Lyndsey Seifert, Records Bureau Supervisor, to Law Legal Clinic (Sept. 17, 2025, 4:55 PM CT) (on file with ACLU of Iowa) [[link](#)].

<sup>176</sup> For example, if a witness can only remember half of the license plate or the color of the vehicle, this would not be considered reasonable suspicion or probable cause but can still prove useful to quickly establish a reliable lead.

<sup>177</sup> See West Des Moines Police Dep't, Automated License Plate Readers (ALPRs) 426.4(f) (2025) [[link](#)]; see also Lisa Fernandez, *Sheriff Pays East Bay Privacy Advocate Nearly \$50k in License Plate Reader Case*, Fox KTVU (Nov. 16, 2020), <https://www.ktvu.com/news/sheriff-pays-east-bay-privacy-advocate-nearly-50k-in-license-plate-reader-case> [<https://perma.cc/7289-T866>].

<sup>178</sup> Iowa Code § 321P.4 (2024).

<sup>179</sup> See, e.g., *Altoona IA PD Transparency Portal*, Flock Safety (Nov. 14, 2025), <https://transparency.flocksafety.com/altoona-ia-pd> [<https://perma.cc/HP44-QPKK>]; *Cedar Rapids IA PD Transparency Portal*, Flock Safety (Nov. 14, 2025), <https://transparency.flocksafety.com/cedar-rapids-ia-pd> [<https://perma.cc/X87S-W5D>J>]; *Clinton IA PD Transparency Portal*, Flock Safety (Nov. 14, 2025), <https://transparency.flocksafety.com/clinton-ia-pd> [<https://perma.cc/SB4W-E6R5>]; *Clive IA PD Transparency Portal*, Flock Safety (Nov. 20, 2025), <https://transparency.flocksafety.com/clive-ia-pd> [<https://perma.cc/R2BG-DD5N>]; *Coralville IA PD Transparency Portal*, Flock Safety (Nov. 14, 2025), <https://transparency.flocksafety.com/coralville-ia-pd> [<https://perma.cc/U3Q7-THCS>]; *Council Bluffs IA PD Transparency Portal*, Flock Safety (Nov. 14, 2025), <https://transparency.flocksafety.com/council-bluffs-ia-pd> [<https://perma.cc/5BGQ-VGPX>]; *Davenport IA PD Transparency Portal*, Flock Safety (Nov. 14, 2025), <https://transparency.flocksafety.com/davenport-ia-pd> [<https://perma.cc/C56J-RHDM>]; *Dubuque IA PD Transparency Portal*, Flock Safety (Nov. 14, 2025), <https://transparency.flocksafety.com/dubuque-ia-pd> [<https://perma.cc/5BGQ-VGPX>].

---

[ia-pd \[https://perma.cc/5NWJ-5YKP\]](https://perma.cc/5NWJ-5YKP); *Indianola IA PD Transparency Portal*, Flock Safety (Nov. 14, 2025), <https://transparency.flocksafety.com/indianola-ia-pd> [https://perma.cc/K9G3-EANM]; *Johnston IA PD Transparency Portal*, Flock Safety (Nov. 14, 2025), <https://transparency.flocksafety.com/johnston-ia-pd> [https://perma.cc/T4HY-BVCE]; *North Liberty IA PD Transparency Portal*, Flock Safety (Nov. 14, 2025), <https://transparency.flocksafety.com/north-liberty-ia-pd> [https://perma.cc/MU6Y-SVEU]; *Burlington IA PD Transparency Portal*, Flock Safety (Nov. 14, 2025), <https://transparency.flocksafety.com/burlington-ia-pd> [https://perma.cc/RC7X-J6GE]; *Carlisle IA PD Transparency Portal*, Flock Safety (Nov. 14, 2025), <https://transparency.flocksafety.com/carlisle-ia-pd> [https://perma.cc/HZ5K-VLJW]; *Polk County Conservation IA Transparency Portal*, Flock Safety (Nov. 14, 2025), <https://transparency.flocksafety.com/polk-county-conservation-ia> [https://perma.cc/YUL8-BYJE]; *University of Iowa PD (IA) Transparency Portal*, Flock Safety (Nov. 14, 2025), <https://transparency.flocksafety.com/university-of-iowa-pd-ia> [https://perma.cc/5NXD-VLB5]; *IA – Storm Lake PD Transparency Portal*, Flock Safety (Nov. 14, 2025), <https://transparency.flocksafety.com/ia-storm-lake-pd> [https://perma.cc/2XWH-FJLW]; *Story County IA SO Transparency Portal*, Flock Safety (Nov. 14, 2025), <https://transparency.flocksafety.com/story-county-ia-so> [https://perma.cc/NK3V-4E6J]; *Urbandale IA PD Transparency Portal*, Flock Safety (Nov. 14, 2025), <https://transparency.flocksafety.com/urbandale-ia-pd> [https://perma.cc/M7Q4-PEM5]; *West Des Moines IA PD Transparency Portal*, Flock Safety (Nov. 14, 2025), <https://transparency.flocksafety.com/west-des-moines-ia-pd> [https://perma.cc/JA2A-X28T].

<sup>180</sup> See ALPR Vendors Reported.

<sup>181</sup> See Gideon Epstein, *Flock Gives Law Enforcement All Over the Country Access to Your Location*, ACLU of Mass. (Oct. 7, 2025), <https://data.aclum.org/2025/10/07/flock-gives-law-enforcement-all-over-the-country-access-to-your-location> [https://perma.cc/3VKP-LMVS].

<sup>182</sup> *Privacy & Ethics*, Flock Safety, <https://www.flocksafety.com/privacy-ethics> [https://perma.cc/2VL6-4EZ7].