

**From:** Jessica de Barros <JessicaD@kcha.org>  
**Subject:** Re: Keep Washington Working Act - Flock Cameras  
**To:** Steven Hellyer <StevenH@kcha.org>; Robin Walls <RobinW@kcha.org>  
**Cc:** Andria Lazaga <AndriaL@kcha.org>; Ponha Lim <PonhaL@kcha.org>  
**Sent:** September 9, 2025 8:31 AM (UTC-04:00)

This has also been weighing on me for the foundational reasons both Robin and Steven lay out - our moral and public obligation to protect human rights, and the fact that we do not have strong data that Flock cameras are mitigating resident safety concerns. Protecting resident privacy *is* protecting resident safety, and could be a more salient form of doing so, given how the landscape has changed. There are also now known political and relationship-based downsides. Should an incident occur in which KCHA Flock camera data is used related to immigration or ICE, not only could this harm residents directly and indirectly, but there could also be even larger communications and public relations consequences.

Jessica

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**From:** Steven Hellyer <StevenH@kcha.org>  
**Sent:** Tuesday, September 9, 2025 12:21 AM  
**To:** Robin Walls <RobinW@kcha.org>  
**Cc:** Andria Lazaga <AndriaL@kcha.org>; Jessica de Barros <JessicaD@kcha.org>; Ponha Lim <PonhaL@kcha.org>  
**Subject:** Re: Keep Washington Working Act - Flock Cameras

Since reading the article you shared, this has been weighing on me. I agree, we are in a different world now, and our business practices and use of tools must adjust to the conditions.

To the best of my knowledge, the most effective measure of Flock cameras is an increase in a jurisdiction's crime clearance rate. Crime clearance rate is typically a key metric for evaluating police effectiveness, it typically measures the percentage of reported crimes that are solved or closed by law enforcement by an arrest being made. The reason Flock cameras are so effective is because they employ automatic license plate recognition (ALPR) technology, and vehicle data is critical given a significant number of crimes involve a vehicle.

Flock cameras integrate with several major law enforcement databases to provide real-time alerts and investigative support. To the best of my knowledge the primary databases include the national crime information center (NCIC), FBI national hotlist, national center for missing and exploited children, amber alerts for child abduction cases, and state hotlists. My understanding is immigration status is not part of these databases, and I believe this is because immigration violations are civil, and not criminal, so they fall outside the traditional scope of criminal justice databases. However, I believe there is limited immigration records within the database, which is known as the immigration violators file (IVF). This file contains records related to people previously convicted of a felony and deported, as well as national security-related violators. It is a narrow subset, not a comprehensive list of undocumented people.

Flock allows agencies to opt out of immigration-related alerts and has stated it does not directly partner with ICE. Immigration enforcement can theoretically intersect with ALPR systems like Flock in the following way: Vehicle Captured by Flock Camera->License Plate & Vehicle Details->Check Against Hotlists->NCIC, Amber Alerts, etc->(If immigration data was added)->Immigration Violators File->Match Found->Alert Sent to Law Enforcement->>Potential ICE Notification for Local Action.

In doing some research, I believe ICE has formal agreements with some companies to access massive ALPR databases, which may explain why it showed up in the NYT article relating to the Chicago immigration crackdown. My understanding is ICE uses this information to track vehicles linked to individuals of interest and sets up hot lists for real-time alerts when a target plate is scanned.

There are also reports ICE has obtained informal access via local agencies, even when companies like Flock prohibit immigration enforcement use, by gaining access through local and state police. ICE does this by asking local officers to share ALPR results informally, which can include data from shared networks or Flock's national lookup system.

The tradeoff is increased clearance rates for the accepted risk of improper usage. By using the cameras, an organization is prioritizing safer communities and faster investigations over the potential for violation of privacy and civil liberties. The situation is exacerbated in Washington State, where we have one of the lowest law enforcement staffing per capita in the United States. Not funding the police is a deliberate policy decision that has created the sort of challenges we've had at our properties maintaining public safety. ALPR systems act as digital patrol officers to augment police departments, but they come at the cost of more alerts from Flock cameras. This means agencies must prioritize alerts and cannot respond to every minor hit.

I say all this to say that I have doubts these cameras are making a significant impact in crime prevention. Even when the cameras create alerts, an already underfunded police department may not even have the patrol resources to respond. The more cameras added to the network, the more difficult this becomes. Ponha may have more data to support the efficacy of these cameras.

The Patriot Act taught us that emergency measures can become permanent, and similar patterns could emerge with ALPR networks. If ALPR networks are being used by ICE, we are at risk of mission creep, and this technology is not being used for its intended purpose.

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**From:** Robin Walls <RobinW@kcha.org>  
**Sent:** Monday, September 8, 2025 10:38 AM  
**To:** Steven Hellyer <StevenH@kcha.org>  
**Cc:** Andria Lazaga <AndriaL@kcha.org>; Jessica de Barros <JessicaD@kcha.org>; Ponha Lim <PonhaL@kcha.org>  
**Subject:** RE: Keep Washington Working Act - Flock Cameras

Hi Steven,

I've pondered this ever since we spoke on Friday and I can't unsee the concerns, just sent a NYT article that popped into my feed about some upcoming activity in another jurisdiction.

I believe that the issues that are outlined in Consideration 2, directly address the concerns. There is no guarantee that the DOJ or any other agency will respect or attempt to comply with a local act, although our intention is compliance with that act.

I agree with recommended actions outlined below.

Also, to consider. While Ordinance 19663 most likely does not apply to KCHA and the original implication of alliance with King County by Council member Mosqueda was specious at best, in this instance, in light of the concerns, what are the value of the Flock cameras to the properties? I weigh safety and security of our residents seriously and KCHA has been underinvested and ignored some of the deep community concerns. However, I also weigh Human Rights seriously and when we started this journey and investments particularly with respect to this technology, we were in a different world than what we are faced with now.

I will have Kami set up a meeting for end of the week.

Robin

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**From:** Steven Hellyer <StevenH@kcha.org>  
**Sent:** Friday, September 5, 2025 3:45 PM  
**To:** Robin Walls <RobinW@kcha.org>  
**Cc:** Andria Lazaga <AndriaL@kcha.org>; Jessica de Barros <JessicaD@kcha.org>; Ponha Lim <PonhaL@kcha.org>  
**Subject:** Re: Keep Washington Working Act - Flock Cameras

Robin --

Andria, Ponha, Jessica, and I had a chance to speak this afternoon about the Flock Cameras and the Keep Washington Working Act.

There are three primary areas for consideration and three follow-up action items we recommend if we are to continue the use of this technology.

### **Consideration 1 - Data Sharing**

There are five levels of data sharing that range from national (least restrictive) to none (most restrictive). Ponha has limited our sharing of Flock data to local law enforcement agencies in King County.

### **Consideration 2 - Disclosure of Footage**

Our current contract has language that would require Flock to provide our data if there is a good faith belief such actions are reasonably necessary to comply with a legal process or an emergency situation. This means federal agencies may receive access to the data if Flock was legally compelled. This language could be in violation of Keep Washington Working (KWW) Act in the event the legal action was enforcement related to immigration.

### Consideration 3 - County Ordinances

King County ordinance 19925 and 19963, which pertain to awarding King County contracts and civil immigration enforcement and limitations on cooperation with federal immigration authorities respectively.

Ordinance 19925 includes language in section 19 that requires contractors to attest to not expending resources facilitating civil enforcement of federal immigration law unless required by court order or regulation. I do not believe ordinance 19925 applies to KCHA since we're an independent municipal entity and Section 2A of the ordinance scopes the ordinance to departments.

Ordinance 19963 likely does not apply to KCHA unless we are acting in a contractor capacity for any services provided to King County.

The action items we recommend to address these considerations include:

- Update and amend our existing memorandums of understanding/agreement with existing law enforcement agencies attesting compliance with the Keep Washington Working (KWW) Act if those agencies would like to continue to receive our Flock alerts.
- Further reduce our data sharing from King County agencies to agencies with a signed memorandum of understanding/agreement attesting KWW compliance, and provide those agencies 90 days to sign an updated agreement.
- Our Flock contract is up for renewal. Negotiate new language into the contract requiring Flock to provide KCHA with 90 days' notice if there is a federal legal action requiring access to our data prior to providing access to a federal agency. Our retention period is currently 30 days, and this would allow KCHA a 60-day window to stop using the cameras.

It also would not hurt to consult our legal counsel to clarify whether these county ordinances apply to KCHA. Even if they do not, this situation is delicate enough to cause potential political tension.

Something Ponha is doing is identifying some additional data points that help reinforce the value of the Flock cameras at our properties.

I believe Ponha has been proactive and taken the appropriate steps to reduce data sharing from the beginning. These additional steps set firmer expectations on use with our law enforcement partners and reduce the risk of the data being used improperly. Let us know if you would like us to proceed with the action items.

Thanks,

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**From:** Andria Lazaga <[AndriaL@kcha.org](mailto:AndriaL@kcha.org)>  
**Sent:** Friday, September 5, 2025 12:34 PM  
**To:** Steven Hellyer <[StevenH@kcha.org](mailto:StevenH@kcha.org)>; Ponha Lim <[PonhaL@kcha.org](mailto:PonhaL@kcha.org)>; Jessica de Barros <[JessicaD@kcha.org](mailto:JessicaD@kcha.org)>  
**Subject:** FW: Keep Washington Working Act - Flock Cameras

Hi Ponha and Jessica. Robin encouraged me to loop Steven into this conversation and luckily he's able to join us at 1.

@Steven – see below/attached.

Best,  
Andria

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**From:** Ponha Lim <[PonhaL@kcha.org](mailto:PonhaL@kcha.org)>  
**Sent:** Thursday, September 4, 2025 4:31 PM  
**To:** Jessica de Barros <[JessicaD@kcha.org](mailto:JessicaD@kcha.org)>; Andria Lazaga <[AndriaL@kcha.org](mailto:AndriaL@kcha.org)>  
**Subject:** Re: Keep Washington Working Act - Flock Cameras

Thanks Andria & Jessica. Attached is the Flock contract. I also copied and pasted Flock's changes in search filters and sharing, applicable to WA state. See below:

**Search filter:**

*"To help enable compliance with Washington laws that restrict law enforcement agency actions related to immigration enforcement and reproductive health rights protected under Washington law, our Product team has created a new Search filter for your agency. This filter is designed to remove your agency's cameras from any search with a search reason that appears to indicate that the search is connected to immigration enforcement or reproductive care. This filter will apply to all searches performed that include any of your networks, whether by your own employees or other agencies that you have shared with, such as via direct one-to-one sharing and the Statewide and Nationwide Lookup tools. We intend to turn on the filter for all law enforcement customers in the state of Washington on Friday (August 15th, 2025)."*

**Sharing:**

*Each LPR camera in your network captures vehicular evidence to help solve crime. That data belongs to you as the customer. As the system administrator, you have full control over whether and how your agency shares this information with others. Time and again, data sharing has proven invaluable—helping agencies locate kidnapped children across state lines, find missing seniors, and solve cross-jurisdictional narcotics and burglary cases. To make this possible, the Flock platform provides flexible options for sharing:*

**1. National sharing**

- Opt into Flock's national sharing network. Access via the national lookup tool is limited—users can only see results if they perform a full plate search and a positive match exists within the network of participating, opt-in agencies. This ensures data privacy while enabling broader collaboration when needed.

**2. Share with agencies in specific states only**

- Share with agencies with similar laws (for example, regarding immigration enforcement and data)

**3. Share within your state only or within a certain distance**

- You can share information with communities within a specified mile radius, with the entire state, or a combination of both—for example, sharing with cities within 150 miles

of Kansas City (which would include cities in Missouri and neighboring states) and / or all communities statewide simultaneously.

4. **Share 1:1**

- Share only with specific agencies you have selected

5. **Don't share at all**

*In some states, sharing is automatically restricted as required by law, and searches with search terms that indicate a purpose prohibited by law have been disabled in our product. For example, in Virginia, out-of-state sharing is disabled and in Illinois, accessing data for certain purposes is not allowed. **However, you are responsible for knowing your agency's laws and policies, and ensuring that you and your agency's users are using the Flock system in compliance with these rules.** Importantly, private customers never have access to law enforcement data. By giving you control over how your data is shared, Flock Safety makes it easier to collaborate across jurisdictions while maintaining compliance and protecting ownership.*

Yes, that's a lot of Flock info on one email! Feel free to review and let's discuss tomorrow on our 1 pm call.

Thanks,

**Ponha Lim** | Vice President of Safety & Security

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**From:** Jessica de Barros <[JessicaD@kcha.org](mailto:JessicaD@kcha.org)>  
**Sent:** Thursday, September 4, 2025 3:48 PM  
**To:** Andria Lazaga <[AndriaL@kcha.org](mailto:AndriaL@kcha.org)>; Ponha Lim <[PonhaL@kcha.org](mailto:PonhaL@kcha.org)>  
**Subject:** RE: Keep Washington Working Act - Flock Cameras

Here is some initial information on KWW Act:

[Immigration and Keep Washington Working Guidance](#) | [Washington State Keep Washington Working Policies](#) | [Washington State King County Ordinance](#) (attached)

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**From:** Andria Lazaga <[AndriaL@kcha.org](mailto:AndriaL@kcha.org)>  
**Sent:** Thursday, September 4, 2025 2:32 PM  
**To:** Ponha Lim <[PonhaL@kcha.org](mailto:PonhaL@kcha.org)>; Jessica de Barros <[JessicaD@kcha.org](mailto:JessicaD@kcha.org)>  
**Subject:** RE: Keep Washington Working Act - Flock Cameras

Hi Ponha. Jessica was also in the meeting with Councilmember Mosqueda and has started digging in to the new County legislation. We're thinking we likely will want an attorney to weigh in but first it would be good for the three of us to get together and figure out what we collectively know, what we don't and what our specific legal questions are. Does that make sense to you?

I'll send a meeting invite, but if you think it's not needed just let us know.

It would also be helpful to me if you could please share our contract with Flock.

Best,  
Andria

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**From:** Ponha Lim <[PonhaL@kcha.org](mailto:PonhaL@kcha.org)>  
**Sent:** Thursday, September 4, 2025 12:51 PM  
**To:** Robin Walls <[RobinW@kcha.org](mailto:RobinW@kcha.org)>  
**Cc:** Andria Lazaga <[AndriaL@kcha.org](mailto:AndriaL@kcha.org)>  
**Subject:** Re: Keep Washington Working Act - Flock Cameras

Thank you, Robin.

Andria - I will connect with you on a separate thread. My team will do some more digging on Flock's data storage, agency sharing, etc. At the moment, our Flock cameras are only sharing with police agencies in King County, which also complies by the Keep Washington Working Act (KWW).

Ponha

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**From:** Robin Walls <[RobinW@kcha.org](mailto:RobinW@kcha.org)>  
**Sent:** Thursday, September 4, 2025 12:45  
**To:** Ponha Lim <[PonhaL@kcha.org](mailto:PonhaL@kcha.org)>  
**Cc:** Andria Lazaga <[AndriaL@kcha.org](mailto:AndriaL@kcha.org)>  
**Subject:** RE: Keep Washington Working Act - Flock Cameras

Also, if we need to get legal interpretation we have plenty of lawyers. Andria may also have some insight.

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**From:** Ponha Lim <[PonhaL@kcha.org](mailto:PonhaL@kcha.org)>  
**Sent:** Thursday, September 4, 2025 12:44 PM  
**To:** Robin Walls <[RobinW@kcha.org](mailto:RobinW@kcha.org)>  
**Subject:** Re: Keep Washington Working Act - Flock Cameras

Received. Let me research and get back to you.

Ponha

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**From:** Robin Walls <[RobinW@kcha.org](mailto:RobinW@kcha.org)>

**Sent:** Thursday, September 4, 2025 12:37

**To:** Ponha Lim <[PonhaL@kcha.org](mailto:PonhaL@kcha.org)>

**Subject:** Keep Washington Working Act - Flock Cameras

Ponha,

Below is the AI summary of the Keep Washington Working Act, which may restrict our usage of Flock Cameras. I was just in a meeting with Councilmember Mosqueda who believe because of the collaboration with law enforcement that use of Flock is restricted in King County based on this act that was recently passed.

Issue is regarding the storage of the data via a 3<sup>rd</sup> party that can retain data which can then be subpoenaed or obtained and used unwittingly. King County is looking for partner agencies to also restrict usage. We need to research this (not just the AI version ) and find out how flock cameras are being restricted.

Robin

The Keep Washington Working (KWW) Act is a Washington state law that protects the rights of immigrant communities by restricting state and local agency collaboration with federal immigration enforcement agencies. It prohibits law enforcement, jails, and other state agencies from collecting immigration-related information, stopping or detaining individuals for civil immigration violations, or honoring federal immigration detainers without a warrant. The Act also prevents these agencies from denying services, benefits, or employment based on an individual's immigration or citizenship status, unless required by federal or state law.

What the Keep Washington Working Act Does:

- **Protects Information:**

Prohibits state agencies from inquiring about or collecting an individual's immigration or citizenship status, place of birth, or nationality unless a connection exists to a violation of state or local law.

- **Restricts Collaboration:**

Prevents local and state law enforcement, jails, and other agencies from assisting with federal immigration enforcement duties or detaining individuals for immigration purposes.

- **Prohibits Detainers (Without Warrant):**



Jails cannot honor federal immigration detainers or notify federal agents of a person's custody for a civil immigration matter without a federal immigration warrant.

- **Ensures Access to Services:**

Guarantees that individuals cannot be denied state or local services, benefits, privileges, or employment due to their immigration or citizenship status.

- **Establishes Guidelines:**

Provides guidance and model policies for state and local agencies on how to comply with the law.

Key Prohibitions for Law Enforcement and Jails:

- Stopping or detaining someone solely to determine their immigration status.
- Providing federal immigration authorities with non-public personal information of individuals in custody.
- Allowing federal agents to interview people in custody regarding civil immigration violations.
- Entering into agreements that deputize local law enforcement to perform federal immigration enforcement duties.

Purpose of the Act:

The Act aims to ensure that Washington's economy and communities remain strong by protecting all state residents, regardless of their immigration status, and by preventing local resources from being diverted to support federal immigration enforcement efforts.

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