

From: Steven Hellyer <StevenH@kcha.org>
Subject: Re: Keep Washington Working Act - Flock Cameras
To: Robin Walls <RobinW@kcha.org>
Cc: Andria Lazaga <AndriaL@kcha.org>; Jessica de Barros <JessicaD@kcha.org>; Ponha Lim <PonhaL@kcha.org>
Sent: September 5, 2025 6:45 PM (UTC-04:00)
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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King County **Housing** Authority
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 [Book time to meet with me](#)

From: Andria Lazaga <AndriaL@kcha.org>
Sent: Friday, September 5, 2025 12:34 PM
To: Steven Hellyer <StevenH@kcha.org>; Ponha Lim <PonhaL@kcha.org>; Jessica de Barros <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

From: Ponha Lim <PonhaL@kcha.org>
Sent: Thursday, September 4, 2025 4:31 PM
To: Jessica de Barros <JessicaD@kcha.org>; Andria Lazaga <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>
Sent: Thursday, September 4, 2025 3:48 PM
To: Andria Lazaga <AndriaL@kcha.org>; Ponha Lim <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)

From: Andria Lazaga <AndriaL@kcha.org>
Sent: Thursday, September 4, 2025 2:32 PM
To: Ponha Lim <PonhaL@kcha.org>; Jessica de Barros <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

From: Ponha Lim <PonhaL@kcha.org>
Sent: Thursday, September 4, 2025 12:51 PM
To: Robin Walls <RobinW@kcha.org>
Cc: Andria Lazaga <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>
Sent: Thursday, September 4, 2025 12:45
To: Ponha Lim <PonhaL@kcha.org>
Cc: Andria Lazaga <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>
Sent: Thursday, September 4, 2025 12:44 PM
To: Robin Walls <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>
Sent: Thursday, September 4, 2025 12:37
To: Ponha Lim <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 3rd 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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