

From: Steven Hellyer <StevenH@kcha.org>
Subject: Re: Keep Washington Working Act - Flock Cameras
To: Jessica de Barros <JessicaD@kcha.org>; Ponha Lim <PonhaL@kcha.org>; Andria Lazaga <AndriaL@kcha.org>
Sent: September 5, 2025 6:00 PM (UTC-04:00)

Thank you for sharing this. I'll bring this up to Robin in my message. While it technically does not apply to KCHA (Section 2A), if it is an expectation of the County Council that KCHA complies, we will probably need to be delicate how we respond to avoid political tension.

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From: Jessica de Barros <JessicaD@kcha.org>
Sent: Friday, September 5, 2025 2:52 PM
To: Ponha Lim <PonhaL@kcha.org>; Steven Hellyer <StevenH@kcha.org>; Andria Lazaga <AndriaL@kcha.org>
Subject: RE: Keep Washington Working Act - Flock Cameras

This is the relevant section:

110 19. The bidder or proposer shall attest that it actively maintains an equal
111 opportunity policy in hiring and promotions, complies with labor and human trafficking
112 laws, and in performance under the county contract will not expend any time, monies, or
113 other resources on facilitating the civil enforcement of federal immigration law or
114 participate in civil immigration enforcement operations, except where state or federal
115 law, regulation, or court order shall so require.

From: Jessica de Barros
Sent: Friday, September 5, 2025 2:51 PM
To: Ponha Lim <PonhaL@kcha.org>; Steven Hellyer <StevenH@kcha.org>; Andria Lazaga <AndriaL@kcha.org>
Subject: RE: Keep Washington Working Act - Flock Cameras

As a follow-up, attached is the new Responsible Bidder legislation sponsored by Councilmember Mosqueda and passed into law. I don't think we are required to comply with this and need to gather further information, but it is an expectation of the Council.

From: Ponha Lim <PonhaL@kcha.org>
Sent: Friday, September 5, 2025 12:54 PM
To: Steven Hellyer <StevenH@kcha.org>; Andria Lazaga <AndriaL@kcha.org>; Jessica de Barros <JessicaD@kcha.org>
Subject: Re: Keep Washington Working Act - Flock Cameras

We are currently not sharing nationally. We reduced the sharing network to only police agencies in King County....

Talk to you all soon.

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From: Steven Hellyer <StevenH@kcha.org>
Sent: Friday, September 5, 2025 12:52 PM
To: Andria Lazaga <AndriaL@kcha.org>; Ponha Lim <PonhaL@kcha.org>; Jessica de Barros <JessicaD@kcha.org>
Subject: Re: Keep Washington Working Act - Flock Cameras

Andria --

Thank you for sharing this information.

A couple of initial thoughts.

We may want to consider turning off national sharing.

Even if we turn national sharing off, Section 5.3, under Confidentiality Disclosures, may be problematic for KCHA.


5.3 Disclosure of Footage. Subject to and during the Retention Period, Flock may access, use, preserve and/or disclose the Footage to law enforcement authorities, government officials, and/or third parties, if legally required to do so or if Flock has a good faith belief that such access, use, preservation or disclosure is reasonably necessary to comply with a legal process, enforce this Agreement, or detect, prevent or otherwise address security, privacy, fraud or technical issues, or emergency situations.

Even if the data is considered "KCHA" property, if Flock is legally required to provide the data, or there is a good faith belief such actions are reasonably necessary to comply with a legal process or an emergency situation, federal agencies may receive access to the data if legally compelled within the retention period. This language could be in violation of Keep Washington Working (KWW) Act in the event the legal action was enforcement related to immigration.

Arguably, KCHA as an agency would not be assisting, however, the data we own as an agency could be used to assist with an enforcement action.

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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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