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January 30, 2025

VIA EMAIL – contact@deflock.me

Re: “DEFLOCK”- Cease and Desist – <https://deflock.me>

Mr. Will Freeman:

We are writing on behalf of Flock Group, Inc., also known as Flock (“Flock”). As you know, Flock has dedicated itself to developing advanced license plate reader and related technologies to enhance the safety and security of communities throughout the country, including by providing these technologies for use in law enforcement.

As you may also be aware, Flock is the owner of the following trademarks, along with their registrations for the same in the United States: “FLOCK SAFETY” (U.S. Reg. Nos. 6842958 and 6846218), “FLOCK ON PATROL” (U.S. Reg. No. 7227626), “FLOCK SAFETY WING” (U.S. Reg. No. 7072424), “FLOCK SAFETY CONDOR” (U.S. App. No. 98274158), “FLOCK SAFETY FALCON FLEX” (U.S. Reg. No. 7362761), “FLOCK SAFETY RAVEN” (U.S. Reg. No. 7243550), “FLOCK SAFETY FALCON” (U.S. Reg. No. 7243541), and “FLOCK SAFETY SPARROW” (U.S. Reg. No. 7045974) (collectively, the “Flock Marks”).

Flock has continuously used Flock Marks since at least 2017 with various security and processing products, including data processing hardware and software (collectively, the “Flock Products”). Flock’s website showing the Flock Marks and the Flock Products is located at: <https://www.flocksafety.com/> (the “Flock Website”). Attached as **Exhibit A** is a screenshot of the Flock Products available on the Flock Website. Through Flock’s continuous, exclusive, and longstanding use, Flock has developed strong rights in and to the Flock Marks. Furthermore, Flock has built a strong reputation and significant goodwill in its Flock Marks, which is widely recognized as a symbol of safety, security, and technological excellence.

It has come to our attention that you are maintaining a website and promoting a project entitled DEFLOCK, which purports to track automated license plate readers across the country, and discusses the alleged dangers of same. While Flock believes in open debate, it takes misuses of its intellectual property seriously. Attached as **Exhibit B** is a screenshot of this website located at: <https://deflock.me> (the “Website”). The name DEFLOCK utilizes our Client’s Flock Marks without permission or authorization, in a manner that is misleading to consumers. Specifically, the Website’s use of DEFLOCK gives consumers the impression that all of the locations of the automated license plate readers are Flock Products. The Website also implies that various license plate readers are vulnerable to security hacks, which given that all of the readers are being imputed to Flock, provides a false impression about the security of Flock Products.

The foregoing use of DEFLOCK gives false impressions about the location and quality of Flock Products and as such constitutes, *inter alia*, dilution by tarnishment under applicable state and/or common laws, as it harms the reputation of our Client's Flock Marks. *See, e.g.*, N.Y. Gen. Bus. Law § 360-l; O.C.G.A. § 10-1-451(b); § 417.061(1), RSMo. Additionally, the use constitutes dilution by blurring as the distinctiveness of the Flock Marks are being impaired by the false association of Flock Marks with third party products, which reduces Flock's capacity to uniquely identify its products. *See*, 15 U.S.C. § 1125(c)(2)(B). Finally, use of DEFLOCK on the Website to falsely imply that all of the readers are Flock Products, and statements regarding security vulnerabilities that are imputed to Flock, constitutes false advertising in that your use of is misrepresenting the nature, characteristics, and qualities of Flock's goods, services, and commercial activities. *See*, 15 U.S.C. § 1125(a)(1)(B).

While Flock does not object to the free dissemination of truthful information, your use of the Flock Marks as part of your brand DEFLOCK is being wrongfully used to make false statements about Flock and its products and is damaging both its reputation and the goodwill associated with the Flock Marks.

Based upon the foregoing, the demand is hereby made that you immediately:

1. Cease and desist all use of the name "DEFLOCK" or any variation thereof;
2. Remove all instances of "DEFLOCK" from your Website, advertisements, promotional materials, and any other content.
3. Refrain from adopting any trademarks, trade names, or branding continue to or likely to cause dilution by blurring, dilution by tarnishment, and false advertising with respect to the Flock Marks in the future.

We request that you confirm compliance in writing within 5 days of receiving this letter. Should you have any questions or require further clarification, do not hesitate to contact us directly.

This letter is not intended as a complete statement of Flock's rights, remedies, or position. Nothing contained herein shall constitute a waiver of any rights of remedies available to Flock, all of which are expressly reserved.

Best regards,

A handwritten signature in black ink, appearing to be 'SM' with a colon, representing Sarah M. Matz.

Sarah M. Matz

EXHIBIT A

Eliminate Crime in Your Community

To solve and eliminate crime – you need evidence. Protect your community, business or school 24/7 with coverage that never sleeps. Empower your law enforcement agency to solve crime faster with Flock's city-wide safety platform.

[Book a Demo](#)

LPR Cameras →

**Flock Safety Falcon®**

Fixed, infrastructure-free LPR for standard two-lane roadways with moderate traffic.

**Flock Safety Falcon Flex®**

Location-flexible LPR for temporary coverage that can be installed anywhere in minutes.

**Flock Safety Sparrow® LPR**

Maintenance-free LPR for neighborhood security that never sleeps.

**Flock Safety Wing® LPR**

Transform your existing camera infrastructure into powerful evidence capturing devices.

Drones

**Flock Aerodome™**

Automated drone-as-first-responder (DFR) system that provides faster, more efficient responses to enhance safety.

Video Cameras →

**Flock Safety Condor™**

Improve safety with live and recorded video for enhanced situational awareness and case clearance.

**Flock Safety Wing®**

Easily integrate third-party LPR and video cameras into FlockOS® for a seamless workflow.

Audio Detection →

**Flock Safety Raven®**

Audio detection that pairs with LPR and video to address gun and vehicle-related crimes.

Trailers

**Mobile Security Trailer**

Deploy this infrastructure-free trailer where and when you need it.

Software

**FlockOS®**

A public safety platform that unifies first and third-party data across video, LPR, and audio to deliver real-time intelligence.

**FlockOS® 911**

Real-time 911 calls and caller-sourced media for enhanced situational clarity in MDTs and RTCCs.

**Traffic Analytics for Businesses**

Get actionable visitor insights from your LPR network to enhance marketing and operations efforts.

**Investigations Manager**

Leverage your LPR network to expand theft and organized crime cases.

**Traffic Analytics for Government**

Unlocks the potential of your LPR Network for critical traffic management insights.



Hi there, how can I best help you?



EXHIBIT B

You're Being Tracked

14,629 ALPRs Reported Worldwide
and rapidly growing!

Featured On

Forbes **404** Los Angeles Times

EXPLORE THE MAP

What is an ALPR

Automated License Plate Readers (ALPRs) are cameras that capture images of all passing license plates, storing details like the car's location, date, and time. These cameras collect data on millions of vehicles—regardless of whether the driver is suspected of a crime. While these systems can be useful for tracking stolen cars or wanted individuals, they are mostly used to track the movements of innocent people.

The Dangers of ALPRs

Privacy Violations

ALPRs track your movements and store your data for long periods of time, creating a detailed record of your location history.

Risk of Misuse

Data from ALPRs has led to [wrongful arrests](#), profiling, and [stalking ex-partners](#) by police officers.

Limited Benefits

There's no substantial evidence that ALPRs effectively prevent crime, despite [Flock's unethical attempts](#) to prove otherwise.

READ MORE

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READ MORE

Explore ALPR Locations Near You

VIEW THE MAP

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For a detailed explanation of how ALPRs are a threat to privacy, see this [ACLU article](#) as well as this [EFF article](#) on ALPRs.

Why Should You Be Concerned

ALPRs invade your privacy and violate your civil liberties. Here's how:

ALPRs Do Not Reduce Crime

There's no independent research proving that ALPRs can reduce crime. Headlines and supporting studies claiming otherwise are often produced by the companies selling ALPRs and the police agencies buying them.

For example, Flock Safety claims that [10% of Reported Crime in the U.S. Is Solved Using Flock Technology](#). The study that Flock cites was conducted by two Flock employees and "given legitimacy with the 'oversight' of two academic researchers whose names are also on the paper" according to [a report by 404 Media](#). Flock Safety is using the veneer of an academic study as part of its sales pitch.

What research does exist regarding the ability of ALPRs to reduce crime is inconclusive at best:

Our findings indicate that, when small numbers of LPR patrols are used in crime hot spots in the way we have tested them here, they do not seem to generate either a general or offense-specific deterrent effect.

-[Journal of Experimental Criminology](#)

There is not even a moderate degree of correlation between ALPRs and stolen vehicle recoveries, let alone any apparent casualty

-[Automated License Plate Readers: A Study in Failure](#)

ALPRs Are a Major Security Risk

Companies that make ALPRs have a history of poor security practices, which can lead to data breaches and unauthorized access to sensitive information. For example:

- In January 2025, Motorola Solutions' ALPR system was [found to have a critical security flaw](#) that allowed anyone to access live data from their cameras. Data includes [license plate numbers, make, model, color, and timestamps](#). A [live feed](#) of both cameras (color and infrared) was also available to stream using a web browser.

ALPR misread errors have led to dangerous police encounters, including pulling guns on innocent drivers. Here are just a few examples:

- [San Francisco Woman Pulled Out of Car at Gunpoint Because of License Plate Reader Error](#)
- [Cops Terrorize Black Family but Blame License Plate Reader for Misidentifying 'Stolen' Vehicle](#)
- [Deputies Sued After False ALPR Hit Leads To Guns-Out Traffic Stop Of California Privacy Activist](#)
- [Privacy advocate sues CoCo sheriff's deputies after license plate readers target his car stolen](#)

ALPRs Result in Racist Policing

ALPRs are more likely to surveil communities with a higher density of Black and brown people, reinforcing systemic racism in policing.

The Electronic Frontier Foundation [reviewed the use of ALPRs by the Oakland Police Department](#) and found that ALPR cameras were more likely to scan license plates in communities with a higher density of Black and brown people than in communities with a higher density of white people.

[A report by The Associated Press](#) shows that after 9/11, the NYPD used ALPRs to monitor Muslims visiting mosques.

A study of Flock Safety's impact in Oak Park, IL found:

In the first 10 months of their use, 84% of the drivers stopped by Oak Park police because of Flock were Black.

ALPRs Put Undocumented People at Risk

Police agencies frequently share ALPR data with ICE, putting undocumented people at risk, even in states where this is legally prohibited:

- [Police in Pasadena, Long Beach pledged not to send license plate data to ICE. They shared it anyway.](#)
- [Documents Reveal ICE Using Driver Location Data From Local Police for Deportations](#)
- [New report finds data sharing with federal immigration agencies might violate Washington law](#)

Photos by Vendor

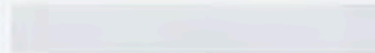
Flock



Motorola/Vigilant

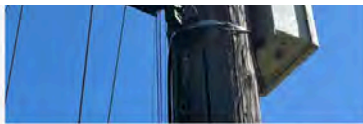


Leonardo/ELSAG



Motorola/Vigilant





Leonardo/ELSAG







Common Vendors




- **Flock Safety** - A leading provider of ALPR technology, known for their solar-powered cameras. This is the most common brand of ALPR in the US. Flock Safety cameras are used by police departments, HOAs, as well as private businesses such as hardware stores and hotels. One of the most appealing features of Flock cameras is the data sharing network, which allows law enforcement agencies to access data from other Flock cameras in the area. This means that even if your local police department doesn't have a Flock camera, they can still access data from other Flock cameras in the area.
- **Vigilant Solutions** - Owned by Motorola Solutions, offering a range of ALPR products and services.
- **ELSAG** - A subsidiary of Leonardo, specializing in ALPR technology.
- **Neology** - Specializes in ALPR technology and tolling solutions.

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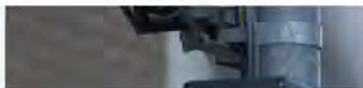
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