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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES**

STOP LAPD SPYING COALITION, Petitioner,

v.

THE CITY OF LOS ANGELES, Respondent.

Case No. **26STCP01633**

**VERIFIED PETITION FOR WRIT OF
MANDATE**

INTRODUCTION

1. The Los Angeles Police Department (LAPD) has been keeping secret the details of its ties to Flock Group, Inc., d/b/a “Flock Safety,” a Georgia-based surveillance firm whose network of thousands of secret cameras are perpetually mapping the movements of every driver in Los Angeles.

2. Flock and LAPD have long shared both camera footage and hardware. This collaboration is facing intense public scrutiny. (See, e.g., Libor Jany, “LAPD’s relationship with Flock Safety under scrutiny from oversight body,” L.A. Times (March 3, 2026), <https://latimes.com/california/story/2026-03-03/lapd-flock-safety-police-commission>.) The concern is widespread: “In recent months, dozens of cities have cut ties with Flock — the nation’s largest provider of automated digital license plate readers — over fears that data the company captures is helping power President Trump’s mass deportation campaign.” (Libor Jany, “Surveillance company Flock generates controversy — and a roster of L.A. clients,” L.A. Times (March 1, 2026), <https://latimes.com/california/story/2026-03-01/surveillance-company-flock-safety-los-angeles>.) To help maintain its hold in Los Angeles, “the company has stepped up its lobbying efforts at City Hall in recent years — hiring Ballard Partners, a powerful Florida-based firm whose employees now include former City Councilmember Joe Buscaino.” (*Ibid.*)

3. Flock first established itself in Los Angeles by arranging for wealthy boosters to donate its

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1 technology to LAPD. (Libor Jany, “A rich L.A. neighborhood donated surveillance technology to the
2 LAPD — then drama ensued,” L.A. Times (April 10, 2025), [https://latimes.com/california/story/2025-
3 04-10/cheviot-hills-license-plate-readers-lapd](https://latimes.com/california/story/2025-04-10/cheviot-hills-license-plate-readers-lapd).) According to LAPD Deputy Chief John McMahon, head
4 of LAPD’s Information Technology Bureau, the goal of these donations was for Flock to “monopolize
5 the business,” which was “not in the best interest of taxpayers.” (*Ibid.*) From early on, Flock “has ignited
6 discussions about who gets to decide how technology donated to the LAPD is deployed — and whether
7 the data collected by the plate readers could be used for purposes far beyond the intended scope.” (*Ibid.*)

8 4. The documents withheld here will reveal the history and terms of LAPD’s evolving relationship
9 to Flock, whose camera network is logging a permanent record of every person and place that each of us
10 visits each day. These documents will explain details of LAPD’s access and oversight of this
11 controversial surveillance system, which keeps growing in Los Angeles even as it’s banned elsewhere.

12 5. At the same time LAPD is blocking the public from auditing these details of its ties to Flock, the
13 department is attempting to self-audit on this issue by promising a forthcoming “report on its
14 relationship with Flock.” (Libor Jany, “Surveillance company Flock generates controversy — and a
15 roster of L.A. clients,” L.A. Times (March 1, 2026), [https://latimes.com/california/story/2026-03-
16 01/surveillance-company-flock-safety-los-angeles](https://latimes.com/california/story/2026-03-01/surveillance-company-flock-safety-los-angeles).) If that report is released while LAPD continues to
17 suppress the records sought here, then LAPD will have defied the Public Records Act to ensure a highly
18 one-sided debate on a time-sensitive matter of urgent public concern.

19 6. The documents sought here – “all contracts, MOUs, MOAs, or other agreements with Flock
20 Safety” since 2017 – should take no more than a few hours to find. Yet this request has been pending for
21 over two months while LAPD has refused to provide anything more than a single, expired agreement.
22 LAPD then went completely silent on this request since March, leaving Petitioner no choice but to sue.

23 **FACTS**

24 7. Petitioner is a community group based in Los Angeles. The group leads a local effort “to not
25 only sever ties between Flock and LAPD but to also change the public’s attitude around data sharing and
26 policing in general.” (Rosalind Jones, “Stop LAPD Spying Coalition Leads the Charge to End LAPD
27 Collaborations With Flock Safety,” Knock LA (April 7, 2026),
28 <https://knock-la.com/stop-lapd-spying-coalition-leads-charge-to-end-collaborations-with-flock/>.)

8. On February 26, 2026, Petitioner sent LAPD this request: “Please provide any and all contracts, MOUs, MOAs, or other agreements with Flock Safety and LAPD, both active, past, and inactive.”

9. On March 25, 2026, LAPD responded by providing Petitioner a single memorandum of understanding dated January 2025. The memorandum states that it will expire after 180 days. LAPD provided no documents from either before or after this one expired agreement.

10. On March 27, 2026, Petitioner wrote back to LAPD: “This response is incomplete. We requested ‘any and all contracts, MOUs, MOAs, or other agreements with Flock Safety and LAPD’ and you have provided only a single expired MOU from the period of January 2025 to July 2025. Please provide all MOUs, contracts, and agreements going back to 2017.”

11. On April 12, 2026, Petitioner wrote again: “We followed up about deficiencies on this request two weeks ago and have received no response. This is a time sensitive request on an extremely newsworthy topic: LAPD’s contracts with Flock Safety, which are the subject of enormous political scrutiny right now. Please respond within the next week. We are prepared to file a writ petition to enforce this request.”

12. LAPD never responded to Petitioner’s March 27 and April 12 communications.

CAUSE OF ACTION

Respondent is violating both the Public Records Act and California Constitution, which gives every Californian “the right of access to information concerning the conduct of the people’s business.”

REQUEST FOR RELIEF

Petitioner respectfully asks that this Court (1) issue either a writ of mandate ordering Respondent to produce the requested records or an order to show cause why it should not be ordered to do so, (2) set times for any “hearings or responsive pleadings with the object of securing a decision as to the matters at issue at the earliest possible time” in accordance with Government Code section 7923.005; (3) award Petitioner its attorney fees and costs; and (4) award any further relief as is just and proper.

DATED: April 27, 2026

Respectfully submitted,

By: /s/ Shakeer Rahman

Attorney for Petitioner