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**Office of
State's Attorney
Champaign County, Illinois**

May 11, 2026
[Via Email Matthew.Goodman@ilag.gov]

Re: FOIA Request for Review: 2026 PAC 93615
Requester: Mr. Samuel Grayson
Date of FOIA Request: March 12, 2026

Dear Matt Goodman:

Regarding the request submitted to the Champaign County Sheriff's Office on March 12, 2026, and Parts 1, 3 and 4 of the request:

1. Current locations of Flock ALPRs. The Public Access Counsel office of the Attorney General determined this information is non-exempt, "while the LPR cameras clearly have a security purpose related to routine law enforcement activities, the nature of that purpose falls outside the plain language of the section 7(1)(v) exemption" (2022 PAC 71393). We appended a copy of this determination to the end of this request for reference.
3. All active hotlists or license plate alert lists, including columns showing the date each entry was added, the reason each entry was added, and the date that each entry expires, excluding PII.
4. Requests for sharing any ALPR information (approved or not) with other agencies since Jan 1, 2025, as such approvals are retained on file pursuant to CCSO Policy 432.7: "The ALPR data may be shared only with other law enforcement or prosecutorial agencies using the following procedures: The agency makes a written request... and the approved request is retained on file".[1]

On April 6, 2026, the Sheriff's Office denied parts one, three, and four pursuant to section 7(1) (d-7) of FOIA.

Regarding section 3 of the request, the Hotlist is a documentation of ongoing use of the system, listing active license plate alerts within the system, how long they last and potentially impacting ongoing investigations and enforcement efforts depending on the status of the hotlist. These are license plates specifically earmarked within the system by law enforcement.

Section 4, seeking share requests for ALPR data also relates to the use of the Flock and ALPR system. These requests are not separate signed agreements with Champaign County Sheriff's

Office. They are confirmation of the terms and conditions of the Flock System, by a law enforcement agency using the system.

Section 7(1) (d-7) specifically states “Information gathered or records created from the use of automatic license plate readers in connection with Section 2-130 of the Illinois Vehicle Code.” As such, these requested records fall within the scope of this exemption. This exemption is not presently limited to ‘Images’, ‘Pictures’ or other more specific results from the system. The language of the exemption is more inclusive of information and records related to the use of the system itself. Requiring the disclosure of all information related to the use of the system will create an enormous burden to law enforcement agencies, as every use or access to the system will become public record, and only personally identifying information (already exempt under other sections of FOIA) will be protected. If that had been the intent of the legislature in enacting Section 7(1) (d-7), the inclusive language of this section would not have been necessary.

While current locations of ALPR’s are not records resulting from the use of an ALPR, their disclosure creates a potential exposure of the vulnerabilities within the ALPR system or jeopardize the effectiveness of the measures currently enacted with Champaign County. While the PAC did previously determine that similar systems were not exempt from disclosure in 2022 PAC 71393, that determination specifically examined whether the responding agency (City of DeKalb) “had establish the element of the LPR camera locations being designed to address potential **attacks** upon the City's population or systems, facilities, or installations. Rather, the City had demonstrated that the LPR camera placements are designed to identify vehicles that are involved in commonplace, smaller -scale criminal activity, such as theft. Thus, while the LPR cameras clearly have a security purpose related to routine law enforcement activities, the nature of that purpose falls outside the plain language of the section 7(1)(v) exemption.”

Section 7(1) (v) additionally exempts information related to “security measures, and response policies or plans that are designed to identify, prevent, or respond to potential attacks upon a community's population or systems, facilities, or installations, but only to the extent that disclosure could reasonably be expected to expose the vulnerability or jeopardize the effectiveness of the measures, policies, or plans, or the safety of the personnel who implement them or the public.”

605 ILCS 140 Expressway Camera Act (Which also deals with ALPR's) demonstrates that ALPRs have the intended use for "investigation of any offenses involving vehicular hijacking, aggravated vehicular hijacking, **terrorism**, motor vehicle theft, or any forcible felony, including, but not limited to, offenses involving the use of a firearm; to detect expressway hazards and highway conditions; and to facilitate highway safety and incident management."

As such, the Champaign County Sheriff's Office would also assert that the location data of the Flock ALPRs is exempt from disclosure.

Sincerely,

A handwritten signature in blue ink, appearing to read 'andy muller'. The 'a' is lowercase and cursive, followed by 'n', 'd', 'y'. The 'm' is also lowercase and cursive, followed by 'u', 'l', 'l', 'e', 'r'. The signature is fluid and connected.

Andrew Muller