

## **Denver Surveillance Task Force Members and Community Organizations Urge "No" Vote on Axon ALPR Contract**

Dear Members of the Denver City Council,

We, the undersigned Surveillance Task Force organizational members, and broader community coalition, respectfully urge you to please vote "no" on 26-0246, the Axon ALPR contract. We have deep concerns about the city rushing into another contract with a new vendor for risky, untested ALPR surveillance technology absent any statutory regulation.

The contract was not shared with Task Force members until March 19, and shared with city council on March 13, just five days before committee vote.

It is apparent that this vendor is quickly building out its technological capabilities, likely to fill a growing market opportunity to replace Flock. As we have seen with Flock and other AI-powered surveillance technologies, this technology is rapidly growing in both capability and power, while regulations lag behind and remain largely nonexistent.

In 2019, Axon's own AI and Policing Technology Ethics Board, a group established by the company itself in 2018 to advise on ethical issues related to its policing technologies, published their second report, covering ALPRs. The report states that there is insufficient regulatory oversight for the technology, cites evidence that the impact of ALPRs falls disproportionately on low income people and people of color, and calls for regulation. "Without regulatory intervention, there is a risk that competition will encourage a race-to-the-bottom of more pervasive and more powerful surveillance."

The first recommendation in the report is "Law enforcement agencies should not acquire or use ALPRs without going through an open, transparent, democratic process, with adequate opportunity for genuinely representative public analysis, input, and objection."

The city of Denver lacks regulatory guidelines, and this contract has been brought in a rushed context limiting formal input from the Surveillance Task Force, established for this exact purpose, and because of the rushed nature, limits meaningful and robust input from the community as a whole. Members of the Surveillance Task Force are working diligently to propose regulations for the council's review, but have not been given the time needed to do this. City council's rejection of the Flock contract extension on May 5, 2025 was met with a promise to convene this Task Force, though it did not first meet until August 22, 2025.

Notably, nine out of twelve of the Axon AI Ethics Board resigned from their roles in 2022 after Axon ignored their concerns about its development of advanced surveillance technology with real-time streaming capabilities. "...for years the Board has warned Axon against the use of real-time, persistent surveillance in its products. Yet, Axon has proposed a degree of surveillance that is sweeping. This type of surveillance undoubtedly will harm communities of color and others who are overpoliced, and likely well beyond that." The technology that DPD is now attempting to procure through Axon also has livestreaming capabilities.

The board members cite that they had lost faith in Axon's ability to be a responsible partner. We saw this firsthand with the city's previous ALPR vendor, Flock Safety, who proved that they, too, were not a responsible partner. The city cannot rely upon third party vendors to set the necessary protections and guardrails around their products. That responsibility must be held by you, the city council, and we are appreciative of the council's stated intention to take this seriously in regards to considering proposed legislation from the Task Force.

Please do not repeat past mistakes in allowing our city to adopt risky and unregulated, powerful surveillance technology. The people of Denver have made their concern clear, and this issue is of the utmost importance to the public. We respectfully ask you to seriously consider the recommendations and proposed legislation of the Surveillance Task Force, once developed, and to engage the public as much as possible in establishing these necessary guardrails to protect our safety and civil liberties.

Sincerely,

**Taskforce Members**

ACLU of Colorado  
Colorado Immigrant Rights Coalition  
Denver Office of the Municipal Public Defender  
Rooted in Flo  
Transforming Our Communities Alliance, TOCA CO

**Community Organizations**

American Friends Service Committee, Colorado  
Bread and Roses Legal Center  
Casa de Paz  
Center on Privacy & Technology at Georgetown Law  
Colorado Criminal Defense Bar Association (CCDB)

Colorado Criminal Justice Reform Coalition  
Colorado Doula Project  
Colorado Jobs with Justice  
Colorado People's Caucus on AI  
CPFR  
CWA, Local 7750  
CWA, Local 7777  
Denver Against Machines  
Denver Anti War Action (DAWA)  
Denver Classroom Teacher Association  
Denver Democratic Socialist of America  
Denver Healing Generations  
Denver's Immigrant Partnership Team  
Denver Justice Project  
Denver Party for Socialism & Liberation  
East Colfax Community Collective  
Green House Connection Center  
Housekeys Action Network Denver  
Immigrant Freedom Fund  
Movimiento Poder  
Newman McNulty  
Our Revolution  
Shut Down GEO Aurora Campaign  
Together Colorado  
Trans Empowerment Alliance  
Trash Heap  
Women Uprising  
Working Families Power