

RE: STATUTORY OBJECTION: Notice of Incomplete Production & Factual Discrepancy (Flock Safety Records)

From Midwest Transparency Audit <mwtransparency.audit@proton.me>

To Jamie Logan <JLogan@cityofgrainvalley.org>

Date Tuesday, September 1st, 2026 at 12:43 PM

Dear City Clerk Logan,

Thank you for your prompt reply on August 25, 2026.

While I understand the City's position that the Sunshine Law does not require a governmental body to "create a new record," your application of that legal principle to electronic database exports is incorrect and directly contradicts current Missouri Supreme Court precedent.

In ***Weeks v. St. Louis County, City of Webster Groves, and REJIS* (No. SC100427, Mo. banc Sept. 3, 2024)**, the Missouri Supreme Court addressed this exact defense regarding law enforcement databases. The Court clarified that querying an existing electronic database and exporting the responsive, pre-existing data (such as a CSV file) is the standard electronic retrieval of public records—it is **not the creation of a new record**.

The Grain Valley Police Department utilizes the FlockOS platform to store and maintain its query logs and network sharing configurations. Because this data already exists within the Department's active, cloud-hosted database, exporting the native `SharedNetworks.csv` or downloading the Insights query log is legally defined as retrieving an existing electronic record. I am requesting the exact, pre-formatted digital exports that the FlockOS software automatically maintains on the Department's behalf.

Furthermore, if the City of Grain Valley maintains its refusal to produce the Insights query logs, please be advised of what you are officially establishing on the public record: **By claiming no search logs exist, the Custodian of Records is officially declaring that the Grain Valley Police Department either conducts zero searches on its Flock cameras, or that the City exercises absolutely zero oversight and has no record whatsoever of who is accessing its \$62,000 automated surveillance network.**

Given the recent, highly publicized abuse of Flock camera access by police personnel in St. Charles County, an official position that Grain Valley does not monitor or possess records of its own system's usage is a startling admission to place on the public record.

My statutory demand stands. If the City of Grain Valley does not export and produce the requested `SharedNetworks.csv` and Insights query logs by **5:00 PM on Friday, August 28, 2026**, or provide a specific statutory exemption under § 610.021, RSMo, authorizing their closure, I will file a formal complaint with the Missouri Attorney General's Office for purposeful violation of the Sunshine Law.

Sincerely,

Managing Member

Midwest Transparency Audit, LLC

mwtransparency.audit@proton.me

www.mw-ta.org

Sent with [Proton Mail](#) secure email.

On Tuesday, August 25th, 2026 at 11:38 AM, Jamie Logan <JLogan@cityofgrainvalley.org> wrote:

Good morning,

The Missouri Sunshine law does not require a public governmental bodies to create records as a response to a records request. The platform may be capable of creating exports and reports, but that does not obligate the municipality to do as a response to a request. We do not currently have the reports you are asking for stored or retained and we have provided access to the existing records we currently hold. If records become available in the future, a request can be made at that time.

JAMIE LOGAN, MRCC | City Clerk

○ 816.847.6211

cityofgrainvalley.org

From: Midwest Transparency Audit <mwtransparency.audit@proton.me>

Sent: Tuesday, August 25, 2026 6:58 AM

To: Jamie Logan <JLogan@cityofgrainvalley.org>

Cc: Ed Turner <eturner@grainvalleypolice.org>

Subject: RE: STATUTORY OBJECTION: Notice of Incomplete Production & Factual Discrepancy (Flock Safety Records)

WARNING: Email originates outside the organization. Please stop and think before clicking a link, opening attachments or entering credentials.

Please forward immediately to the City of Grain Valley's retained City Attorney / Legal Counsel.

Dear City Clerk Logan and Chief Turner,

I am in receipt of your email dated August 24, 2026, enclosing the *Data Sharing Agencies* list and stating: *"There are no other records responsive to your request."*

While the production of the network sharing matrix is acknowledged, the City's continued refusal to produce Item #2—specifically the **FlockOS "Insights" External Query Audit Log** and **Administrative Event Logs**—constitutes an unlawful denial of public records under Chapter 610, RSMo (the Missouri Sunshine Law).

I. Conclusive Proof of Record Existence

The City's assertion that query and audit records do not exist is conclusively disproven by the official contract, departmental policy, and internal directives produced by your own office:

1. Contractual Guarantee of "Insights" Auditing Functionality:

The City's executed agreement with Flock Group Inc. (Exhibit A, "FlockOS Features & Description") explicitly provides the **Flock Insights/Analytics** suite to the Department, defined as a:

"Reporting tool to help administrators manage their LPR program with device performance data, user and network audits, plate read reports, hot list alert reports, event logs, and outcome reports."

2. Active FlockOS Administrative Interface:

Chief Turner's Directive (07-22-2026) includes a direct screenshot of the Grain Valley Police Department's active FlockOS interface. The top administrative navigation bar visibly displays the active **"Insights"** and **"Admin"** modules.

3. Mandatory Electronic Audit Trail:

In the Department's Employee Information Bulletin (07-17-2026), Chief Turner explicitly instructs personnel that:

"Every search conducted within the Flock system is electronically recorded and auditable," and that "Because every inquiry is logged, all system activity is subject to audit."

4. Department Policy Mandates:

GVPD Policy § 425.5(b) requires that all ALPR system access be *"capable of documenting all access of information by name, date and time,"* and § 425.5(e) mandates regular ALPR system audits.

II. Precedent Under *Weeks v. CJIS*

Under Missouri law, and as reinforced by the precedent established in *Weeks v. CJIS*, electronic database records and system audit trails maintained or operated by a public agency (or its contracted vendors) are open public records. A public governmental body cannot shield these logs from disclosure. Denying the existence of an automated digital audit log that is explicitly documented in your contracts, software interface, and executive memos cannot be reconciled with Chapter 610, RSMo.

III. Specific Records Demanded

To cure this deficiency, the Department's FlockOS Administrator must simply access the active portal and generate the standard administrative exports:

1. External Network Query Log (12-Month Period):

From the **Insights** tab, export the CSV log documenting all external agency queries that searched Grain Valley's camera network over the past 12 months. *(Native FlockOS CSV exports automatically mask license plate numbers with asterisks, requiring zero manual redaction by city staff).*

2. Administrative Event Log / Network Sharing Audit:

From the **Admin** or **Insights** tab, export the administrative log detailing the dates, timestamps, and authorized users who enabled or approved data-sharing links with external agencies.

If your office requires an example of exactly what these native CSV exports look like, you can view redacted samples currently hosted online at our website: www.mw-ta.org.

IV. Statutory Demand & Reservation of Rights

Pursuant to § 610.023.3, RSMo, please produce these existing digital CSV files within **three (3) business days** (by **5:00 PM on Friday, August 28, 2026**).

If the City continues to withhold these records, you are required under § 610.023.4, RSMo, to provide a written response citing the specific statutory exemption authorizing their closure.

Please be advised that persistent denial of public records with knowledge of their existence constitutes a purposeful violation under **§ 610.027, RSMo**, which provides for civil penalties of up to \$5,000.00 and an award of all reasonable attorney's fees and costs. Failure to produce these logs within the statutory timeframe will result in the immediate filing of a formal Sunshine Law Complaint with the **Missouri Attorney General's Office** and the pursuit of all available legal remedies.

Sincerely,

Managing Member

Midwest Transparency Audit, LLC

mwtransparency.audit@proton.me

www.mw-ta.org

Sent with [Proton Mail](#) secure email.

On Monday, August 24th, 2026 at 3:50 PM, Jamie Logan <JLogan@cityofgrainvalley.org> wrote:

Hello,

Please see the attached. There are no other records responsive to your request.

JAMIE LOGAN, MRCC | City Clerk

📞 816.847.6211

cityofgrainvalley.org

From: Midwest Transparency Audit <mwtransparency.audit@proton.me>

Sent: Thursday, August 20, 2026 4:55 AM

To: Jamie Logan <JLogan@cityofgrainvalley.org>

Cc: Ed Turner <eturner@grainvalleypolice.org>

Subject: STATUTORY OBJECTION: Notice of Incomplete Production & Factual Discrepancy (Flock Safety Records)

WARNING: Email originates outside the organization. Please stop and think before clicking a link, opening attachments or entering credentials.

Dear City Clerk Logan,

I am in receipt of your email dated August 19, 2026, and the attached batch of initial records.

While I appreciate the prompt production of the invoices and internal policies, I must issue a formal statutory objection regarding your claim that "There are no records responsive to #2." (Item #2 requested the digital SharedNetworks.csv export and the "Insights" Network Audit Log).

The assertion that these records do not exist is factually contradicted by the very documents you provided in this production:

- **Grain Valley Police Department Policy 425:** Section 425.5(d) explicitly states ALPR data may be released to other law enforcement agencies. Furthermore, Section 425.5(e) mandates that "ALPR system audits should be conducted on a regular basis".

- **Chief Ed Turner's Employee Information Bulletin (07-17-2026):** Chief Turner explicitly states the Flock system is used for "Enhancing regional information sharing" and warns personnel that "Because every inquiry is logged, all system activity is subject to audit".
- **Chief Directive (07-22-2026):** The provided screenshot of the Department's FlockOS interface shows the Location parameter actively set to "All Network(s) Selected," verifying active network integration.

Because the Department's own standard operating procedures and internal memos confirm that the system is actively audited and utilized for regional data sharing, the native SharedNetworks.csv configuration and the "Insights" audit logs **definitively exist** within the Department's active FlockOS dashboard.

Supplemental Clarification (Administrative Event Logs): To ensure absolute clarity regarding the requested audit records in Item #2, I am explicitly requesting the **Administrative Event Logs** (often found under the Admin or Insights tab). This native CSV export details the timestamps and administrative actions taken by system administrators—specifically the logs recording when Grain Valley Police Department administrators manually approved or executed data-sharing agreements with external agencies.

Please immediately produce the SharedNetworks.csv export, the Insights external query log, and the Administrative Event Log for the past 12 months. As previously stated, native CSV exports from the FlockOS system automatically mask sensitive license plate data with asterisks (***), requiring zero manual redaction or legal review time by city staff.

If the City of Grain Valley maintains its refusal to produce these existing digital records, please identify the specific statutory exemption under Chapter 610, RSMo, that authorizes their closure.

Sincerely,

Managing Member

Midwest Transparency Audit, LLC

mwtransparency.audit@proton.me

www.mw-ta.org

Sent with [Proton Mail](#) secure email.

On Wednesday, August 19th, 2026 at 1:47 PM, Jamie Logan <JLogan@cityofgrainvalley.org> wrote:

Good afternoon,

Please see attached records responsive to your request. There are no records responsive to #2 or #3. Have a great day.

JAMIE LOGAN, MRCC | City Clerk

📞 816.847.6211

cityofgrainvalley.org

From: Jamie Logan

Sent: Wednesday, August 19, 2026 10:22 AM

To: 'mwtransparency.audit@proton.me' <mwtransparency.audit@proton.me>

Subject: FW: Missouri Sunshine Law Request - ALPR System Records (Flock Safety)

Hello,

The Sunshine Law request has been received by the City of Grain Valley. Pursuant to the Missouri Sunshine Law, RSMo § 610.023, the City will respond to your request no later than three (3) business days after receipt. If additional time is needed to process the request, you will be notified in accordance with the Missouri Sunshine Law.

JAMIE LOGAN, MRCC | City Clerk



📞 816.847.6211

711 Main Street • Grain Valley, MO 64029

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From: Midwest Transparency Audit <mwtransparency.audit@proton.me>

Sent: Wednesday, August 19, 2026 9:40 AM

To: City of Grain Valley <info@cityofgrainvalley.org>

Subject: Missouri Sunshine Law Request - ALPR System Records (Flock Safety)

WARNING: Email originates outside the organization. Please stop and think before clicking a link, opening attachments or entering credentials.

ATTN: Jamie Logan (City Clerk / Custodian of Records) and Chief of Police

Dear Custodian of Records,

Pursuant to the Missouri Sunshine Law, Chapter 610, RSMo, Midwest Transparency Audit, LLC is formally requesting access to and copies of the following public records pertaining to the City of Grain Valley and the Grain Valley Police Department's use of Automated License Plate Reader (ALPR) systems, specifically regarding Flock Group Inc. (dba Flock Safety):

- 1. Contracts and Financials:** Any and all current or past contracts, Memorandums of Understanding (MOUs), service agreements, financial invoices, or subscription agreements between the City of Grain Valley / Grain Valley Police Department and Flock Group Inc.
- 2. Data-Sharing Matrices & Audit Logs:** Any documents or electronic records detailing data access, query capabilities, or network integrations with external law enforcement agencies via the Flock Safety Cloud platform. To eliminate any requirement for internal legal review or manual redaction, please fulfill this item by providing the native digital exports generated directly by the FlockOS dashboard:
 - **Network Sharing Configuration (SharedNetworks.csv):** The dashboard export detailing which specific external agencies are granted access to Grain Valley's network, and which external networks are shared back to Grain Valley.
 - **Network Audit Log:** The system-generated CSV export from the "Insights" tab detailing instances where external network partners queried Grain Valley's cameras over the last 12 months. (When exported natively from FlockOS, this CSV automatically masks sensitive license plate numbers with asterisks, requiring zero manual redaction by city staff).
- 3. Private Deployment Access Agreements:** Any records of agreement or standard operating frameworks detailing the Department's access to private Flock Safety cameras deployed by local businesses, commercial properties, or homeowners associations (HOAs) within Grain Valley.
- 4. Internal Usage Policies:** All internal department policies, data-retention schedules, training materials, standard operating procedures (SOPs), and user auditing mandates governing how officers use Flock Safety tools or automated license plate readers.

As these are standardized administrative records, I am formally requesting that all responsive documents be produced electronically and delivered via email to mwtransparency.audit@proton.me to minimize processing and copying expenses.

Pursuant to § 610.026, RSMo, and the Missouri Supreme Court's ruling in *Gross v. Parson*, public agencies are strictly prohibited from charging requesters for internal attorney review or redaction time. If any administrative fees for the clerical search exceed \$25.00, please provide a binding, itemized cost estimate before compiling the records.

If this request is denied in whole or in part, I request that you justify all deletions or denials by reference to specific exemptions of the Missouri Sunshine Law, as required by § 610.023.4, RSMo. I will expect a response within three (3) business days, as required by § 610.023.3, RSMo.

Please acknowledge receipt of this request.

Sincerely,

Managing Member

Midwest Transparency Audit, LLC

mwtransparency.audit@proton.me

www.mw-ta.org

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