

FORMAL NOTICE OF INCOMPLETE PRODUCTION – Public Records Request

July 8th

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

To Karen Findora <karen.findora@cityofodessamo.com>

Date Tuesday, July 14th, 2026 at 8:30 AM

Dear Ms. Findora,

Thank you for providing the 2022 Flock Service Agreement in response to my public records request.

After reviewing the provided contract and cross-referencing it with the City of Odessa's own internal documents, it is clear that this initial production is incomplete. My request encompasses the full scope of how this surveillance system is funded and managed. Under Chapter 610, RSMo, I am formally requesting the following responsive documents that were omitted from your initial production:

- **Grant Documentation:** The City's October 24, 2022, Board of Aldermen Action Report explicitly references a \$5,500 grant from the Bureau of Justice Assistance (BJA). Please provide the grant application, the federal award letter, and the financial ledger demonstrating the disbursement of these funds, specifically accounting for the surplus beyond the \$3,250 Year 1 contract fee.
- **MoDOT Right-of-Way Permits:** The same October 24 Action Report states the camera is positioned east of the intersection of 131 Highway and Old 40 Highway. Please provide the executed MoDOT Right-of-Way permit authorizing this installation on state-maintained routes.
- **State Compliance & MULES Documentation:** The vendor's "Flock for Missouri" documentation outlines mandatory requirements for location approvals from MoDOT, formal approval letters to the Director of the Missouri Department of Public Safety (DPS), and MULES integration requests. I am requesting these state compliance documents, along with any associated CJIS oversight logs regarding the system's usage.
- **Data-Sharing Agreements:** Section 4.2 of the Flock Group Inc. contract you provided explicitly permits data disclosure to other agencies. Please provide any Memorandums of Understanding (MOUs) or inter-agency agreements detailing which neighboring jurisdictions or external entities have authorized access to the Odessa Police Department's ALPR data.

To ensure the City remains in full compliance with the Missouri Sunshine Law, please respond within **twenty-four (24) hours** of the receipt of this email with one of the following:

1. **The remaining requested records**, provided electronically;

2. **A written justification for the denial** of these specific records, citing the exact statutory exemption under § 610.021, RSMo; or
3. **A specific and reasonable date** by which the remaining records will be produced.

If I do not receive one of these three responses within the 24-hour window, I will be forced to escalate this matter and forward the incomplete production to the Missouri Attorney General's Office for formal enforcement.

Thank you for your prompt and professional attention to this matter.

Sincerely,

Managing Member

Midwest Transparency Audit LLC

mwtransparency.audit@proton.me

On Monday, July 13th, 2026 at 11:37 AM, Karen Findora <karen.findora@cityofodessamo.com> wrote:

Good morning,

You can find information on the FLOCK system by following the link below.

<https://www.cityofodessamo.com/departments/Police/automated-license-plate-readers>

I have attached our contract.

Karen Findora, MRCC

City Clerk ~ Human Resources

City of Odessa, Missouri

228 S 2nd Street

P.O. Box 128

Odessa, MO 64076

Phone: 816.230.5577 ext. 6

karen.findora@cityofodessamo.com

<http://www.cityofodessamo.com>



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On Wed, Jul 8, 2026 at 9:33 AM Midwest Transparency Audit <mwtransparency.audit@proton.me> wrote:

This is the first time you received an email from this sender (mwtransparency.audit@proton.me). Exercise caution when clicking links, opening attachments or taking further action, before validating its authenticity.

Dear Custodian of Records,

Pursuant to the Missouri Sunshine Law, Chapter 610, RSMo, I hereby request access to and copies of the following public records maintained by, or under the custody of, the City of Odessa and the Odessa Police Department:

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 Odessa/Odessa Police Department and Flock Group Inc. (dba Flock Safety).
2. **Data-Sharing Inter-Agency Agreements:** Any documents, electronic agreements, or "Hotlist" sharing records detailing data access, query capabilities, or network integrations with external law enforcement agencies (including neighboring county sheriffs, state agencies, or regional task forces) via the Flock Safety Cloud platform.
3. **Private/Commercial Surveillance 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 Odessa.

4. **Internal Usage Policies & Audit Frameworks:** 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.

Per § 610.023.3, RSMo, you are required to act upon this request as soon as possible, but no later than the end of the third business day following the date this request is received. If access to any portion of these records is denied, please provide a written statement citing the specific statutory exemption authorizing the closure of the record.

Pursuant to § 610.026, RSMo, and the Missouri Supreme Court's ruling in *Gross v. Parson*, please note that public agencies are strictly prohibited from charging requesters for internal attorney review, legal evaluation, or redaction time. I request that these records be provided digitally via email/download link to minimize processing and copying expenses.

If fees are not waived and will exceed \$25.00, please provide a binding, itemized cost estimate before compiling the records.

Thank you for your time and assistance in this matter.

Sincerely,

Midwest Transparency Audit

mwtransparency.audit@proton.me

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