

FORMAL NOTICE OF INCOMPLETE PRODUCTION – Public Records Request

July 8th, 2026

From Midwest Transparency Audit <mwtransparency.audit@proton.me>
To Tom Noon <tnoon@sheriff.raycountymo.gov>
CC Amy Sisson <asisson@sheriff.raycountymo.gov>, Jordan Crossland <jcrossland@sheriff.raycountymo.gov>
Date Tuesday, July 14th, 2026 at 8:45 AM

Dear Lt. Colonel Noon,

Thank you for acknowledging my Sunshine Law request in your previous email. I appreciate the clarification that the Ray County Sheriff's Office does not maintain direct contracts or subscription agreements with Flock Safety, and that the hardware operating within the City of Richmond is administered directly by the municipality.

However, your response regarding the remaining portions of my request is currently out of compliance with the statutory requirements of the Missouri Sunshine Law.

You stated that the Sheriff's Office is "reviewing the remaining portions of your request to determine whether any responsive records exist." Under **§ 610.023.3, RSMo**, if access to public records is not granted immediately, the custodian must provide a detailed explanation of the cause for the delay alongside **the earliest specific date and time that the records will be available**. An indefinite, open-ended review period is not permitted under the statute.

Furthermore, items #2 and #4 of my original request explicitly asked for:

- **Data-Sharing Inter-Agency Agreements:** Any MOUs, agreements, or electronic "Hotlist" sharing records detailing your agency's authorized ability to access, query, or receive data from external ALPR networks.
- **Internal Usage Policies:** Any internal SOPs, training materials, or mandates governing how Ray County personnel are permitted to utilize external ALPR data during investigations.

While the City of Richmond may own the physical infrastructure, it is a matter of public record that the Ray County Sheriff's Office utilizes ALPR data-sharing networks. For instance, in March 2025, the Ray County Sheriff's Office utilized inter-agency coordination to broadcast suspect information that was subsequently entered into Clay County's Flock camera network to successfully apprehend a fleeing homicide suspect from the Lawson area.

Because Ray County law enforcement personnel actively access, query, and utilize external ALPR networks for operational success, the governing MOUs authorizing that access and the internal operational policies dictating its use are undeniably responsive records maintained by your agency.

To cure this statutory timeline violation, please provide one of the following within **twenty-four (24) hours** of the receipt of this email:

1. **The remaining requested records**, provided electronically to mwtransparency.audit@proton.me;
2. **A formal written denial**, citing the specific statutory exemption under § 610.021, RSMo, if you maintain that absolutely no data-sharing agreements or internal usage policies exist within your agency despite documented operations utilizing the technology; or

3. **A specific and reasonable date and time** by which the review will be completed and the records produced, as explicitly required by § 610.023.3, RSMo.

I look forward to your prompt and legally compliant response to resolve the remainder of this request.

Sincerely,

Managing Member

Midwest Transparency Audit LLC

mwtransparency.audit@proton.me

On Friday, July 10th, 2026 at 11:19 PM, Tom Noon <tnoon@sheriff.raycountymo.gov> wrote:

Dear Midwest Transparency Audit,

This email acknowledges receipt of your Sunshine Law request.

Please note that the Ray County Sheriff's Office does not have any current or past contracts, subscription agreements, or service agreements with Flock Safety. The Flock Safety system operating within the City of Richmond is owned and administered by the City of Richmond, not the Ray County Sheriff's Office.

To the extent your request seeks records concerning contracts or agreements for that system, those records may be maintained by the City of Richmond. The Sheriff's Office is reviewing the remaining portions of your request to determine whether any responsive records exist.

Lt. Colonel Tom Noon



Ray County Sheriff's Office

200 W. 9th St.

Henrietta, MO 64036

Dispatch: (816) 776-2000

Office: (816) 290-5323

Fax: (816) 290-5548

[Book a Meeting with Me](#)

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

Sent: Wednesday, July 8, 2026 8:55 AM

To: Ray County

Subject: Missouri Sunshine Law Records Request: ALPR & Flock Safety Infrastructure (Sheriff's Office)

CAUTION: This email originated from OUTSIDE of the SOS organization. Do not click on links or open attachments unless you are expecting the email and know that the content is safe. If you believe this to be a malicious or phishing email, please use Phish Alert to report it.

Dear Ray County Clerk/Sheriff Blackwell

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 Ray County Clerk and the Ray County Sheriff's Office:

1. **Contracts and Financials:** Any and all current or past contracts, Memorandums of Understanding (MOUs), service agreements, financial invoices, or subscription agreements between Ray County/Ray County Sheriff's Office and Flock Group Inc. (dba Flock Safety).
2. **Inter-Agency Data-Sharing Networks:** Any documents, electronic agreements, regional network parameters, or "Hotlist" sharing records detailing data access, query capabilities, or network integrations with external law enforcement agencies—specifically including municipal departments such as the Richmond Police Department—via the Flock Safety Cloud platform.
3. **Private/Commercial Surveillance Agreements:** Any records of agreement or standard operating frameworks detailing the Sheriff's Office's access to private Flock Safety cameras deployed by local businesses, agricultural operations, commercial properties, or homeowners associations (HOAs) within Ray County.
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 deputies 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*, public agencies are strictly prohibited from charging requesters for internal attorney review or redaction time. I request that these records be provided digitally 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

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

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