

Courtesy Security Notice: Unredacted Financial & Hardware Data in Records Release

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

To Saige Mason <cityclerk@cityofrichmondmo.org>

CC sbagley@richmondpolice-mo.com

Date Friday, July 31st, 2026 at 10:10 AM

Dear City Clerk Mason,

I am writing to provide a courtesy security alert regarding the public records released by your office. As part of Midwest Transparency Audit's standard intake process, we run a forensic sweep on all documents to ensure no sensitive or exempt data was accidentally released before we publish them to our public accountability archive.

During our review of the Flock Safety financial records—specifically the documents stemming from the Master Service Agreement approved by the City Council on January 23, 2024—we discovered that live, unredacted financial and hardware data was included in the production.

Specifically, the records release contained:

1. **Live Financial Data:** The Payment Remittance Information section on the invoices clearly displays Flock Group Inc.'s active checking account number and Routing/SWIFT codes.
2. **Hardware Identifiers:** The documentation explicitly lists the seven unique hardware serial numbers for the Flock Safety Falcon cameras deployed by the Police Department.

Releasing live ACH routing data in a public records request is a significant security oversight that leaves your vendor's payment portal vulnerable to wire fraud. Furthermore, publishing the exact serial numbers of active law enforcement surveillance hardware creates an unnecessary operational security risk for the Police Department.

To protect the City and your vendor, Midwest Transparency Audit has permanently redacted this sensitive financial and hardware data on our end before uploading the files to our public ledger. We highly advise your office to update your master redaction files to mask these sections for any future Sunshine Law requests, if any.

Thank you for your time and your continued commitment to transparency.

Sincerely,

Managing Member

Midwest Transparency Audit, LLC

mwtransparency.audit@proton.me

www.mw-ta.org

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

On Tuesday, July 28th, 2026 at 4:30 PM, Saige Mason <cityclerk@cityofrichmondmo.org> wrote:

Hello,

Thank you for your response, and we appreciate you narrowing the scope of your request. As discussed in my letter to you dated July 13, we must still review the information requested to determine whether any closed record designations are necessary. For this and other reasons referenced in the July 13 letter, we previously estimated August 12, 2026 at 3:00 p.m. as the earliest date and time records would be made available to you. However, if due to the narrowed scope of your request we are able to provide those records sooner we will notify you.

Thank you,

Saige Mason

City Clerk/Executive Assistant to the City Administrator
City of Richmond | 205 Summit Street | Richmond, MO 64085
Phone: (816) 776-5304 x1103 | Fax: (816) 776-8216
cityclerk@cityofrichmondmo.org



From: Midwest Transparency Audit <mwtransparency.audit@proton.me>
Sent: Monday, July 27, 2026 8:00 AM
To: Saige Mason <cityclerk@cityofrichmondmo.org>
Cc: sbagley@richmondpolice-mo.com <sbagley@richmondpolice-mo.com>
Subject: Streamlined Scope & Formal Notice - Public Records Request (Item #2: FlockOS Sharing Logs)

Dear City Clerk Mason,

I am following up on the remaining records for Item #2 of my public records request, originally submitted on July 8, 2026, with our last correspondence on July 17, 2026.

We understand that manually reviewing and redacting individual license plate numbers line-by-line from system audit logs can be a time-consuming administrative burden for the Police Department. Our goal is public transparency, not to tie up city resources with unnecessary redaction work.

To resolve this efficiently and avoid further statutory delay, I am offering to streamline the scope of Item #2 as follows:

1. Network Sharing Configuration (sharedNetworks.csv): The dashboard export detailing which specific external agencies are granted access to Richmond's network, and which networks are

shared back to Richmond. This configuration file contains zero license plates.

2. Network Audit Log: The system-generated CSV export from the "Insights" tab detailing instances where external network partners queried Richmond's cameras. It is our understanding that when exported natively from FlockOS, this specific CSV automatically masks external operator names and license plate numbers with asterisks (***), requiring zero manual redaction by your staff.

3. Event Log: The administrative action log detailing internal changes to network sharing settings or hotlist configurations.

All of these native CSV exports can be found on Police Chief Bagley's FlockOS Dashboard. Because the `SharedNetworks.csv` matrix requires no redactions whatsoever, please provide that specific export by **5:00 PM on Tuesday, July 28, 2026**. If the Department requires additional time to format the streamlined audit logs, please provide a revised, reasonable timeline for that specific file.

Please be advised that this streamlined scope represents a good-faith effort to accommodate the City while ensuring compliance with Chapter 610, RSMo. If the City refuses to provide these non-exempt digital dashboard exports or fails to respond by the deadline established above, Midwest Transparency Audit, LLC will proceed with filing a formal complaint with the Missouri Attorney General's Transparency Division for a purposeful violation of the Sunshine Law pursuant to § 610.027, RSMo.

Thank you for your prompt attention to bringing this matter to a conclusion.

Sincerely,

Managing Member

Midwest Transparency Audit, LLC

mwtransparency.audit@proton.me

cc-sbagley@richmondpolice-mo.com

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

On Friday, July 17th, 2026 at 4:17 PM, Midwest Transparency Audit <mwtransparency.audit@proton.me> wrote:

Dear City Clerk Mason,

Thank you for reaching out for clarification. I am happy to provide the exact specificity required under *Anderson v. Village of Jacksonville* to assist the Police Department in locating the records.

To answer your direct question: I am requesting BOTH the records detailing the "kind" of information shared (the network configurations and permissions) AND the digital logs of the information that has actually been shared (the system audit logs).

To ensure a reasonably competent custodian can easily identify and export these records from the active FlockOS platform, I am specifically requesting:

1. The Framework (The "Kind" of information): Screenshots, PDF exports, or digital reports from the Richmond Police Department's FlockOS dashboard (specifically the "Sharing" or "Network" settings tabs) that explicitly list which external agencies (such as the Ray County Sheriff's Office) have been granted access to Richmond's camera feeds.

2. The Audit Logs (The information actually shared): The digital "Audit Logs" or "Search Logs" generated by the FlockOS platform detailing instances where external agencies accessed, queried, or received "Hotlist" alerts from Richmond's camera network. If the Department maintains that specific license plate numbers within these logs are closed under an investigative exemption (§ 610.021, RSMo), the City is required to redact the exempt portions (the plate numbers) and provide the remaining metadata (the dates, times, and agencies querying the system).

Because these are readily available digital dashboard exports and standardized system logs, the requirement for production within a "reasonable" time remains.

Please provide the requested digital exports, or the specific statutory exemption under § 610.021, RSMo, justifying the withholding of these specific logs, by the previously established deadline of 5:00 PM today, July 17, 2026.

Regards,

Managing Member

Midwest Transparency Audit LLC

117 S Lexington Street Ste 100, Harrisonville, MO, 64701

mwtransparency.audit@proton.me

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

On Friday, July 17th, 2026 at 2:55 PM, Saige Mason <cityclerk@cityofrichmondmo.org> wrote:

Hello,

Thank you for your response. We are working with the City's Police Department in an attempt to identify additional records retained by the City that may be responsive to item #2 of your request.

I am requesting clarification on the scope of your request. A request for records requires that the requestor be reasonably specific so that a custodian of records can identify and provide access to the record. *Anderson v. Village of Jacksonville*, 103 S.W.3d 190, 194-95 (Mo. App. W.D. 2003). In item #2 of your request, you asked for electronic agreement and "Hotlist" sharing records that detail external law enforcement data access, but in your follow up yesterday you mentioned electronic sharing logs, network integration parameters, and the technical "hotlist" sharing framework currently in use. Please clarify the scope of your request, including whether you are requesting records related to the kind of information shared with external law enforcement agencies or whether you are requesting records of the information that has been shared.

Regards,

Saige Mason

City Clerk/Executive Assistant to the City Administrator
City of Richmond | 205 Summit Street | Richmond, MO 64085
Phone: (816) 776-5304 x1103 | Fax: (816) 776-8216
cityclerk@cityofrichmondmo.org



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

Sent: Thursday, July 16, 2026 8:00 AM

To: Saige Mason <cityclerk@cityofrichmondmo.org>

Subject: Re: FORMAL NOTICE OF UNREASONABLE DELAY – Public Records Request (Received July 8, 2026)

Dear City Clerk Mason,

Thank you for your July 15, 2026, correspondence regarding my public records request. I acknowledge receipt of the documents provided and am satisfied with Items #1, #3, and #4.

Upon reviewing the production, I am writing to provide notice that the response remains incomplete regarding Item #2 of my July 8 request.

While I acknowledge receipt of the Memorandum of Understanding with Ray County, this does not satisfy the entirety of Item #2. My request explicitly sought: *"Any documents, electronic agreements, or 'Hotlist' sharing records detailing data access, query capabilities, or network integrations with external law enforcement agencies... via the Flock Safety Cloud platform."*

The Ray County MOU is a single agreement; it does not constitute the electronic sharing logs, network integration parameters, or the technical "Hotlist" sharing framework currently *active on the department's FlockOS dashboard*.

A 30-day delay (until August 12) to export standardized digital logs from an active, cloud-based platform—**which you are already utilizing**—constitutes a facial violation of the Sunshine Law's requirement for production within a "reasonable" time, particularly when the records are stored in a digital medium readily accessible by your department.

Action Required: Please provide the remaining digital "Hotlist" sharing logs and network integration settings by **Friday, July 17, 2026, at 5:00 PM**. If you are unable to provide these digital exports by this deadline, please provide a written justification for why this specific digital export requires an additional 27 days of review, citing the specific statutory exemption you believe justifies this delay.

I appreciate your cooperation in bringing this request to a prompt conclusion.

Regards,

Midwest Transparency Audit

mwtransparency.audit@proton.me

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

On Wednesday, July 15th, 2026 at 11:17 AM, Saige Mason <cityclerk@cityofrichmondmo.org> wrote:

Hello,

Hello,

Please find the attached letter and three additional attachments in response to the Sunshine Law Request received by me on July 8th, and in addition to the response letter sent by me to you on July 13, 2026.

Thank you,

Saige Mason

City Clerk/Executive Assistant to the City Administrator

City of Richmond | 205 Summit Street | Richmond, MO 64085

Phone: (816) 776-5304 x1103 | Fax: (816) 776-8216

cityclerk@cityofrichmondmo.org



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

Sent: Tuesday, July 14, 2026 8:11 AM

To: Saige Mason <cityclerk@cityofrichmondmo.org>

Subject: FORMAL NOTICE OF UNREASONABLE DELAY – Public Records Request (Received July 8, 2026)

Dear Ms. Mason,

I am in receipt of your correspondence dated July 13, 2026, regarding the public records request received by your office on July 8, 2026.

While I acknowledge your intent to process the request, the proposed production date of August 12, 2026—constituting a 35-day delay from the date of receipt—fails to meet the standard of "reasonable cause" required by **§ 610.023.3, RSMo**.

Under the Missouri Sunshine Law, public records must be provided within three business days. If a delay is necessary, the governmental body must provide a detailed explanation of the cause for the delay. The six justifications provided in your letter do not constitute reasonable cause for a month-long delay when cross-referenced against the specific and narrow scope of my request.

Please note the following statutory and administrative discrepancies regarding your delayed timeline:

1. Scope and Nature of the Request vs. Time Required Your letter cites the "scope of your request" and the need to "review various mediums and devices" as a reason for the 35-day delay. However, my request is highly specific. It is limited to four narrow administrative categories pertaining to a single vendor (Flock Group Inc. / Flock Safety):

- Standard vendor contracts, invoices, and MOUs.
- Data-Sharing and Private Deployment Agreements.
- Internal Usage Policies and SOPs.

These are standardized, centrally located administrative and operational documents. They do not require complex electronic discovery across "various mediums," nor do they require extensive redactions for closed records.

2. Staff Absences and "Press of Other Business" Your letter cites "previously scheduled absences of City officials" and the "press of other City business" as justifications for the delay. The Missouri Attorney General's Office and Missouri courts have consistently established that a municipality's understaffing, scheduled vacations, or daily operational duties do not suspend its statutory obligations under Chapter 610. These factors cannot be legally leveraged to indefinitely toll the production of public records.

3. Failure to Provide a Prompt Fee Estimate Your letter states you are "currently in the process of calculating a cost estimate." Because the requested documents are standardized contracts and active

departmental policies, locating them to calculate a page count or retrieval time should take hours, not weeks.

To ensure the City of Richmond remains in compliance with the Missouri Sunshine Law, I formally request that you revise this timeline immediately. Please provide the following within **twenty-four (24) hours** of the receipt of this email:

1. **An Immediate Fee Estimate:** An itemized cost estimate for the production of these records. I am prepared to remit payment immediately.
2. **An Expedited Rolling Production:** If the City maintains that it cannot produce the entirety of the file within five (5) to seven (7) business days, I request a rolling production. Please provide the executed Flock Group Inc. contract, the financial invoices, and the Department SOPs immediately, while you continue to review the data-sharing agreements.
3. **Electronic or Mailed Production:** Your letter states the records will be available to "pick up at City Hall." Requiring an in-person physical pickup for electronic administrative files places an unnecessary and unreasonable burden on the requester. I am formally requesting that all responsive records be produced electronically and delivered via email to mwtransparency.audit@proton.me. If the City maintains that the file sizes are too large for email transmission, I am fully willing to pay the actual cost for the records to be loaded onto a USB drive and mailed directly to the physical address of Midwest Transparency Audit LLC's registered agent. Please include any associated media and shipping costs in your immediate fee estimate.

Under **§ 610.027.2, RSMo**, the burden of proof rests on the public governmental body to sustain its action in delaying or denying access to records. A 35-day delay for basic vendor contracts and operational policies is facially unreasonable.

If a legally compliant, expedited timeline and fee estimate are not provided within the next 24 hours, Midwest Transparency Audit LLC will file a formal complaint with the Missouri Attorney General's Office for a purposeful violation of the Sunshine Law.

I look forward to your prompt and professional response.

Sincerely,

Managing Member

Midwest Transparency Audit LLC

mwtransparency.audit@proton.me

On Monday, July 13th, 2026 at 4:08 PM, Saige Mason <cityclerk@cityofrichmondmo.org> wrote:

Hello,

Please find the attached letter in response to the Sunshine Law request below.

Thank you,

Saige Mason

City Clerk/Executive Assistant to the City Administrator

City of Richmond | 205 Summit Street | Richmond, MO 64085

Phone: (816) 776-5304 x1103 | Fax: (816) 776-8216

cityclerk@cityofrichmondmo.org



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

Sent: Wednesday, July 8, 2026 8:43 AM

To: Tonya Willim <twillim@cityofrichmondmo.org>

Cc: Saige Mason <cityclerk@cityofrichmondmo.org>

Subject: Missouri Sunshine Law Records Request: ALPR & Flock Safety Infrastructure

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 Richmond and the Richmond 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 Richmond/Richmond 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 or state/federal agencies) via the Flock Safety Cloud platform.
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).
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.

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

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

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