

November 19, 2025

Rep. Sandra Feist, Co-Chair
MN House of Representatives

Sen. Eric Lucero, Co-Vice Chair
MN Senate

Rep. Peggy Scott, Co-Chair
MN House of Representatives

Sen. Erin Maye Quade, Co-Vice Chair
MN Senate

Dear Members of the Legislative Commission on Data Practices,

We, the undersigned organizations, submit this letter to emphasize the importance of data privacy and surveillance technology issues for the Minnesota communities we serve. We urge the Commission to continue to prioritize protecting the rights and liberties of all Minnesotans.

The rapid expansion of government surveillance systems such as automatic license plate readers (ALPRs) and facial recognition technology is far outstripping privacy safeguards. Increased, unregulated surveillance of immigrant and refugee communities as a result of this expansion showcases this. This kind of warrantless and often secret surveillance should serve as the veritable canary in the coal mine for all communities that the government has the potential power to violate anyone's rights and liberties. Consider, for example, the deployment of Flock automated license plate cameras in Washington state, where even local law enforcement agencies didn't know that federal law enforcement agencies were accessing their Flock camera data for months.¹ We urge this Commission to explore stronger, forward-looking privacy protections.

Government use of things like reverse tracking warrants (also known as geofence warrants) also place Minnesotans at risk. Citizens and non-citizens alike can be identified as potential suspects based on nothing more than a GPS ping. This and other types of reverse warrants, such as reverse keyword search warrants, raise significant concerns for the communities we serve, including immigrant victims of domestic violence and trafficking, torture survivors, and children. They should also raise serious concerns for all Minnesotans. We urge this Commission to consider prohibitions on these types of warrants.

Data privacy at the intersection of state and federal government rules and laws has been, and continues to be, fraught. Data collection, retention, and sale by third parties is prolific and profitable. Instead of asking where and how to practice better data retention and maintenance, it might be better for the Commission to begin asking where and how it is best to collect data in the first place.

¹ <https://www.heraldnet.com/news/records-feds-accessed-flock-camera-info-thousands-of-times-in-snohomish-county/>

We look forward to continuing to engage with the Commission over the rest of the interim on other surveillance technology issues, as well as Chapter 13 issues involving data classifications and definitions.

Thank you,



Legal Services Advocacy
Project

