

**COUNTY OF MILWAUKEE**  
Inter-Office Communication

Date: April 22, 2026

To: Marcelia Nicholson-Bovell, Chairwoman, Milwaukee County Board of Supervisors

From: Jaci Bobo, Director and Chief Information Officer, Department of Administrative Services – Information Management Services Division

Subject: Report from the Director and Chief Information Officer, Department of Administrative Services – Information Management Services Division (DAS-IMSD), providing an informational report on the development of a comprehensive policy framework for facial recognition technology that does not suppress First Amendment related activities, violate privacy, or otherwise adversely impact individuals' civil rights and liberties for Milwaukee County.

File Type: Informational Report

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**BACKGROUND**

This report serves as an update to File and Resolution 25-427 from the June 2025 cycle and the File and Informational Report 25-743 from the December 2025 cycle. The Resolution requested DAS-IMSD to coordinate with relevant stakeholders in development of a countywide policy addressing the use of facial recognition technology (FRT).

At the December 2025 Committee on Judiciary, Law Enforcement and General Services (JLEGS) meeting, DAS-IMSD and MCSO jointly reported and presented an overview of the County's deployed camera technologies and that no FRT capabilities are currently deployed. The presentation also included an overview of MCSO's proposed Biometrica FRT use case and a draft version of MCSO's FRT policy. Since the last update, MCSO has withdrawn the proposed Biometrica FRT proposal. At this time, DAS-IMSD is not aware of proposed FRT use cases.

## TECHNOLOGY OVERVIEW

As outlined in the December 2025 JLEGS presentation, the County has multiple types of camera systems. Some of these systems include static image capture cameras, such as booking photo cameras, while others include full motion video capture cameras, such as general security cameras used in secure and public spaces. This encompasses a range of camera capabilities.

A second range is the image recognition capabilities applied to the image and / or video captured. For example, Automated License Plate Reader (ALPR) cameras capture static images and are augmented with image recognition capabilities that can identify vehicle types, colors, bumper stickers, and license plates. MCSO's previously proposed Biometrica FRT solution applies facial recognition capabilities to static images captured via booking cameras. A third capability, not proposed, is live facial recognition (LFR), which is passive, automated, real-time searching of facial images from a video stream against a collection of reference images, referred to as a 'watchlist' in order to elicit an immediate response.

Range of Camera Capabilities			
Image Recognition Capabilities	Static Image Capture – Booking Cameras	Full Video – Mobile Camera Trailers	Full Video – General Security Cameras, Flock Safety Condor Cameras, etc.
	Static Image Capture – Flock Safety Falcon ALPR Cameras	Full Video – Patrol Car Cameras Integrated with ALPR	Full Video – Enhanced with Post-Event FRT Capabilities via Software
	Static Image Capture – <u>Biometrica</u> for Booking Images (MCSO Previously Proposed)	Full Video – Hardware Enhanced with Capabilities Delivering Live Facial Recognition	Full Video – Hardware Enhanced with Capabilities Delivering Live Facial Recognition AND Integration with Other Surveillance Systems

*Items in Green are currently deployed. Items in Yellow are Previously Proposed but not under consideration at this time. Items in Gray are not deployed and are not under consideration. For Items in Gray, the County's existing hardware and software also do not have these capabilities.*

The matrix shown above outlines the intersections of these two ranges. With any type of data capture, access and sharing restrictions come into play. It is also important to note that multiple departments with different elected officials, not only MCSO, have camera deployments. MCSO supports some of these deployments (e.g., ALPR cameras for Parks), while other departments maintain and operate their cameras (e.g., District Attorney's Axon body cameras, individual departments for general security cameras, etc.). DAS-IMSD's involvement and review is limited to the purchasing, operation, and security of technology, not the policy implications of using surveillance and facial recognition technology.

When discussing FRT, the County may choose not to use or limit its use of FRT. However, if a third-party entity obtains the underlying images or video, that third-party may have the ability to use FRT on the obtained data. DAS-IMSD and MCSO discussed this situation with the Board, and public concerns about FRT often highlight this possible situation. Therefore, policies and procedures around the County's use of FRT should address governance around both camera deployments and image recognition capabilities.

## **OPTIONS**

As outlined above, options to address the governance around cameras and associated technologies are challenged by multi-layered authorities.

### *Option 1 – Departmental Evaluation and Oversight of Cameras and FRT – Establish Governance – Recommended*

Within each elected official's purview, establish a committee with members from key stakeholder groups to evaluate and oversee their camera deployment strategy, including associated possible supporting technologies (e.g., FRT). Each elected official's oversight committee's responsibilities would include:

- Creation of a camera deployment and maintenance strategy, including budget implications, and oversight of camera deployments, vendor management, etc.
- Evaluation and approval / rejection of new camera technologies and associated supporting technologies.
- Establishment of policies and procedures around cameras and FRT, including:
  - Ensuring Protection of Civil Liberties
  - Authorized and Prohibited Uses
  - Accuracy and Bias Mitigation
  - Data Management and Sharing
  - Ensuring Legal and Regulatory Compliance

- Oversight and Transparency, including self-audits, County internal audits, third-party audits, reporting to County elected officials, and reporting to the public.

*Option 2 – Continued Departmental Camera Deployment and Cross-Departmental FRT Ban – Current State for Cameras, Ban FRT County-wide*

Continue the current departmental-by-departmental evaluation, deployment, and funding of cameras on a case-by-case basis with no oversight committees. Through the Administrative Manual Operating Procedures (AMOP) or County ordinances processes, establish a County-wide, cross-departmental ban on the use of FRT.

*Option 3 – Cross-Departmental Camera and FRT Ban – Not Feasible*

Severely restrict existing camera deployments or outright ban cameras on a County-wide, cross-departmental basis. Establish a County-wide, cross-departmental ban on the use of FRT.

**ALIGNMENT TO STRATEGIC PLAN**

- Create Intentional Inclusion – Create and nurture an inclusive culture across Milwaukee County.
- Bridge the Gap – Apply a racial equity lens to all decisions.
- Invest in Equity – Dismantle barriers to diverse and inclusive communities.

**FISCAL EFFECT**

The report is informational only and has no tax levy impact.

**VIRTUAL MEETING INVITES**

- Denita Ball, Sheriff
- Brian Barkow, MCSO Chief Deputy
- Scott Brown, Chief Corporate Counsel, Office of Corporation Counsel
- Jaci Bobo, DAS Chief Information Officer, DAS-IMSD
- Matt Johnson, DAS Deputy Chief Information Officer, DAS-IMSD
- Jeremy Lucas, Policy Director, Office of Strategy, Budget, and Performance

**PREPARED BY:**

- Matt Johnson, Deputy Chief Information Officer, DAS-IMSD

**APPROVED BY:**

*Jacqueline Bobo*

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**Jaci Bobo**

*Director and Chief Information Officer*

Department of Administrative Services – Information Management Services Division

*Aaron Hertzberg*

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*Executive Director Administrative Services*

Department of Administrative Services

cc: Denita Ball, Sheriff  
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