

FREEDOM OF INFORMATION COMMISSION
OF THE STATE OF CONNECTICUT

In the Matter of a Complaint by

FINAL DECISION

Feizo Zeko,

Complainant

against

Docket #FIC 2025-0711

Chief, Police Department, City of
Norwalk; Police Department, City of
Norwalk; and City of Norwalk,

Respondents

July 22, 2026

The above-captioned matter was heard as a contested case on March 13, 2026, at which time the complainant and the respondents appeared, stipulated to certain facts, and presented testimony, exhibits and argument on the complaint.

After consideration of the entire record, the following facts are found and conclusions of law are reached:

1. The respondents are public agencies within the meaning of §1-200(1), G.S.
2. It is found that on August 11, 2025, the complainant requested the following records from the respondents for the period of July 10, 2024 through August 10, 2025:

[Part 1]

All Automated License Plate Reader (ALPR) detections, queries, hot-list entries, alerts, or analytic hits referencing Connecticut registration BL-96357 or Feizo Zeko, including date, time GPS/segment ID, camera ID, hit reason and any alert recipient list.

...

[Part 2]

All Computer-Aided Dispatch (CAD), dispatch logs, unit histories, or officer narratives referencing BL-96357 or Feizo Zeko, including call types, remarks, unit numbers, and dispositions.

[Part 3]

All body-worn camera or in-car video footage associated with stops contacts, or incidents involving BL-96357 or Feizo Zeko, prioritizing July 10, 2024, to August 10, 2025, due to retention limits.

[Part 4]

The agency's ALPR data retention and external-sharing policies, including any memoranda of understanding with other agencies or vendors (e.g., Flock Safety, Vigilant/LEARN).

[Part 5]

All dissemination or audit logs showing release of information about BL-96357 or Feizo Zeko to non-law-enforcement recipients, including private businesses or entities. . . .

3. It is found that on August 12, 2025, the respondents informed the complainant that they had conducted a search of their systems and did not locate any records responsive to his request described in paragraph 2, above.¹

4. By complaint received and filed on August 12, 2025, the complainant appealed to this Commission alleging that the respondents violated the Freedom of Information ("FOI") Act, by failing to provide all records responsive to his request described in paragraph 2, above.

5. Section 1-200(5), G.S., provides:

"[p]ublic records or files" means any recorded data or information relating to the conduct of the public's business prepared, owned, used, received or retained by a public agency, or to which a public agency is entitled to receive a copy by law or contract under section 1-218, whether such data or information be handwritten, typed, tape-recorded, videotaped, printed, photostated, photographed or recorded by any other method.

6. Section 1-210(a), G.S., provides in relevant part that:

[e]xcept as otherwise provided by any federal law or state statute, all records maintained or kept on file by any public agency whether or not such records are required by any law or by any rule or regulation, shall be public records and every person shall have the right to . . . (3) receive a copy of such records in accordance with section 1-212.

¹ In their response, the respondents also indicated that "License Plate Reader data" was generally exempt from disclosure under §§1-210(b)(2) and 1-210(b)(3)(E), G.S. At the March 13, 2026 hearing, however, the respondents did not claim any exemptions.

7. Section 1-212(a), G.S., provides in relevant part that “[a]ny person applying in writing shall receive, promptly upon request, a plain, facsimile, electronic or certified copy of any public record.”

8. It is concluded that the records described in paragraph 2, above, to the extent they exist and are maintained by the respondents, are public records within the meaning of §§1-200(5) and 1-210(a), G.S.

9. With respect to Part 1 of the complainant’s request described in paragraph 2, above, it is found that the respondents maintain two ALPR systems. It is further found that any records responsive to Part 1 of the request would be stored within one of those two systems.

10. It is found that the respondents queried both of their ALPR systems described in paragraph 9, above, using the complainant’s name and license number for the period of July 2024 through August 2025. It is found, however, that such query did not locate any records responsive to Part 1 of the complainant’s request.

11. With respect to Part 2 of the complainant’s request described in paragraph 2, above, it is found that any such records would be stored in the respondents’ case management system, NexGen. It is found that the respondents searched their NexGen system using the complainant’s first and last name (together and separately) as well as his license plate number, but found no responsive cases or incidents for the period of July 2024 through August 2025.

12. With respect to Part 3 of the complainant’s request described in paragraph 2, above, it is found that the respondents’ system for reviewing body-camera and in-vehicle camera footage is searchable only by case number, and not by an individual’s name or license plate number. As found in paragraph 11, above, the respondents did not identify any cases or incidents involving the complainant or his license plate number. Accordingly, because the respondents did not identify any case number associated with the complainant or his license plate number, they had no searchable identifier with which to locate body-camera or in-vehicle camera footage responsive to Part 3 of the complainant’s request.

13. With respect to Part 4 of the complainant’s request described in paragraph 2, above, it is found that such request seeks two categories of records: (i) the respondents’ ALPR data retention and sharing policies (“ALPR policies”); and (ii) memoranda of understanding (“MOUs”) with other agencies or ALPR vendors.

14. As found in paragraph 3, above, the respondents initially indicated that they did not maintain any records responsive to the complainant’s request described in paragraph 2, above. It is found, however, that sometime after the complaint was filed in this matter, the respondents located and provided the complainant with a copy of Directive 4.3.20, pertaining to License Plate Recognition System (“LPR”). It is found that Directive 4.3.20 is responsive to the portion of Part 4 of the complainant’s request seeking ALPR policies.

15. It is found that the respondents presented no evidence as to when they provided the complainant with a copy of Directive 4.3.20. Moreover, based on the evidence in the administrative record, it is unclear why the respondents did not provide the complainant with a copy of Directive 4.3.20 in their initial response on August 12, 2025.

16. In the absence of such evidence, it is found that the respondents failed to prove that they promptly provided the complainant with a copy of Directive 4.3.20.

17. With respect to the portion of Part 4 of the complainant's request seeking MOUs with other agencies or ALPR vendors, it is found that the respondents interpreted the request as limited to MOUs pertaining to LPR data sharing. It is found, however, that such interpretation is too narrow. Part 4 of the complainant's request specifically seeks "*any* memoranda of understanding with other agencies or [ALPR] vendors." (Emphasis added).

18. As found in paragraph 9, above, the respondents maintain two systems for ALPR data. It is found that those systems are provided by two vendors, Flock Safety and Axon. It is found, however, that the respondents presented no evidence as to their search for MOUs or similar agreements² with either vendor.

19. It is found, therefore, that the respondents failed to prove that they conducted a reasonably diligent and thorough search for MOUs or similar agreements responsive to Part 4 of the complainant's request. Accordingly, it is found that the respondents failed to prove that they provided the complainant with all records responsive to Part 4 of his request.

20. With respect to Part 5 of the complainant's request described in paragraph 2, above, it is found that the respondents located no cases, incidents, or other records associated with the complainant or his license plate number. It is found, therefore, that the respondents did not maintain dissemination or audit logs showing the release of such information to non-law-enforcement recipients, including private businesses and entities.³

21. It is further found that the respondents contacted their Community Policing Division, which handles community outreach, and confirmed that they did not maintain any records concerning the complainant or his license plate number. In fact, it is found that the Community Policing Division was not familiar with the complainant.

22. It is found that, with respect to Parts 1, 2, 3, and 5 of the complainant's request described in paragraph 2, above, the respondents conducted reasonably thorough and diligent searches and found no records responsive to those portions of the complainant's request.

² Although Part 4 of the complainant's request only references "memoranda of understanding," the FOI Act is used "repeatedly by members of the public who are unschooled in technical, legalistic language distinctions." See Perkins v. Freedom of Information Commission, 228 Conn. 158, 166-67 (1993). It is found that the complainant was seeking *agreements* between the respondents and ALPR vendors, not just those documents titled "Memorandum of Understanding." It is found that contracts, service agreements, memoranda of agreements, and other similar records would be responsive to Part 4 of the complainant's request.

³ At the March 13, 2026 hearing on this matter, the complainant indicated that the respondents should have searched for correspondence between police officers and local businesses for records responsive to Part 5 of the complainant's request, described in paragraph 2, above. It is found, however, that Part 5 seeks "all dissemination or audit logs. . . ." It is found that such a request is reasonably interpreted as a request for two types of logs: (i) a dissemination log; and (ii) an audit log. Even affording the complainant's request a broad interpretation, such a request does not reasonably include correspondence.

23. It is concluded, therefore, that the respondents did not violate the FOI Act with respect to Parts 1, 2, 3, and 5 of the complainant's request as they did not maintain any records responsive to those portions thereof.

24. It is concluded, however, that for the reasons outlined in paragraphs 13 through 19, above, the respondents violated the promptness and disclosure provisions of §§1-210(a) and 1-212(a), G.S., with respect to Part 4 of the complainant's request.

The following order by the Commission is hereby recommended on the basis of the record concerning the above-captioned complaint:

1. Within twenty-one (21) days of the date of the Notice of Final Decision in this matter, the respondents shall: (i) conduct a thorough and diligent search for memoranda of understanding (or similar agreements) responsive to Part 4 of the complainant's request described in paragraph 2 of the findings, above; and (ii) provide the complainant with copies of any such records, unredacted and free of charge.

2. If, after conducting a thorough and diligent search pursuant to paragraph 1 of this order, above, the respondents do not locate any memoranda of understanding (or similar agreements) responsive to Part 4 of the complainant's request described in paragraph 2 of the findings, above, then within twenty-one (21) days of the date of the Notice of Final Decision in this matter, the respondents shall submit an affidavit to the Commission detailing the nature of such search. Any such affidavit shall be submitted to the Commission via email, at foi@ct.gov, with a copy to the complainant.

3. Henceforth, the respondents shall strictly comply with the promptness and disclosure requirements of §§1-210(a) and 1-212(a), G.S.

Approved by Order of the Freedom of Information Commission at its regular meeting of July 22, 2026.

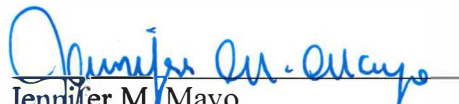

Jennifer M. Mayo
Acting Clerk of the Commission

PURSUANT TO SECTION 4-180(c), G.S., THE FOLLOWING ARE THE NAMES OF EACH PARTY AND THE MOST RECENT MAILING ADDRESS, PROVIDED TO THE FREEDOM OF INFORMATION COMMISSION, OF THE PARTIES OR THEIR AUTHORIZED REPRESENTATIVE.

THE PARTIES TO THIS CONTESTED CASE ARE:

FEIZO ZEKO, 16 Rutlee Drive, Trumbull, CT 06611

CHIEF, POLICE DEPARTMENT, CITY OF NORWALK; POLICE DEPARTMENT, CITY OF NORWALK; AND CITY OF NORWALK, c/o Attorney M. Jeffry Spahr, Corporation Counsel, City of Norwalk, 125 East Avenue, Room 237, Norwalk, CT 06851



Jennifer M. Mayo
Acting Clerk of the Commission