

Barriers Made of Cameras:

Extending Equal Access to Public Spaces from Concrete to Surveillance Infrastructure

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ABSTRACT

Meaningful access to public space, the standard the Americans with Disabilities Act applies to the streets and sidewalks of every American city, is denied by announced mass surveillance to a class of people with psychiatric disabilities, those for whom observation is the clinical content and public space avoidance is the clinical consequence, spanning the paranoia spectrum, posttraumatic stress disorder, social anxiety disorder, and agoraphobia, and the argument for saying so has already been accepted in its physical form. Whaley, Martinis, Pagano, Barthol, Senzer, Williamson, and Blanck (2024) document that more than three decades after the ADA, architectural barriers still deny disabled Americans full and equal access to public spaces, and that the doctrine treating the public right of way as a service, program, or activity of the city is settled. This article extends their argument to a barrier their survey does not reach. The entitlement it extends is older than the statute, the right tenBroek named the right to live in the world, and scholarship has carried that right off the pavement once already, into the internet's virtual spaces; this article carries it into the surveillance layer. A staircase applies to every person identically, and no defendant prevails by defending one on that ground, because the stairs do not cost everyone the same thing, and the people they cost are the people they exclude. Automated license plate reader networks and allied camera systems have the same structure. They are uniform on their face, unequal in what they extract, and, for this class, they dismantle the intervention that makes public space usable at all: across these conditions the treatment is relearning safety by entering feared situations, and an environment that announces continuous organizational observation converts that exercise from disconfirmation into confirmation at the severe end of the paranoia spectrum, installs the trauma cue at every threshold for the hypervigilant, and makes the feared audience actual and archival for those whose disability is fear of scrutiny. The mechanism rests on measured ground: randomized urban exposure worsens the relevant processes in this population, and perceived surveillance measurably suppresses ordinary behavior in the general population. The claim runs on the meaningful access standard of *Alexander v. Choate* rather than on a freestanding disparate impact rule, through the reasonable modification and methods of administration regulations, on the same statutory ground the curb ramp cases secured. Their barriers are made of concrete. These are made of cameras. The statute does not distinguish between the two materials, and neither should the field.

Keywords: disability rights; disability law; meaningful access; reasonable modification; ADA Title II; methods of administration; persecutory delusions; paranoia spectrum; posttraumatic stress disorder; social anxiety disorder; automated license plate readers; reality testing

I. INTRODUCTION

Consider a staircase. It is the most evenhanded object in the built environment. It applies to every person who arrives at the building in exactly the same way, makes no inquiry into who is climbing, and excludes no one by rule. It is also the founding villain of American disability law, and in more than three decades of litigation under the Americans with Disabilities Act, no defendant prevails by arguing that a staircase is lawful because it treats all comers equally. The defense fails on contact because everyone can see what it misses: the stairs do not cost everyone the same thing, and the people they cost the most are the people they exclude entirely.

Whaley, Martinis, Pagano, Barthol, Senzer, Williamson, and Blanck (2024) have written the definitive recent account of how that insight fares on the ground. Their article, produced at the Burton Blatt Institute at Syracuse University as the American arm of the multinational Inclusive Public Space Project, surveys the federal, state, and local legal apparatus that is supposed to guarantee people with disabilities full and equal access to public spaces, and finds it chronically underenforced. Sidewalks buckle and go unrepaired. Curb ramps are promised in settlement agreements and abandoned in budget cuts. Cities meet accessibility claims with jurisdictional and procedural defenses that have nothing to do with whether a wheelchair user can get down the block. The authors state their premise directly: civil rights laws such as the ADA “were, and must be, premised on equal access in fact, not just equality in theory” (Whaley et al. 2024, p. 3), and access to public space is a gateway right, because a person who cannot use the sidewalk cannot reach the courthouse, the workplace, or the store at the end of it. The debt is stated in the title: the argument is theirs, and only the barrier is new.

Everything in their account concerns barriers made of matter. Concrete that heaved, ramps that were never poured, displays that blocked a curb cut, snow that made the crossing impossible. This article accepts their argument in full and extends it to a barrier made of something else. The right it extends has a name older than the statute, tenBroek’s right to live in the world, and Part II places this extension in that line.

Over the past decade, American public space has acquired a second infrastructure layered on top of the first. Automated license plate readers, fixed pole cameras, and allied detection systems now blanket the public right of way. The largest vendor states that its network alone performs more than 20 billion vehicle scans per month across more than 5,000 communities, and describes its corporate objective as a camera network reaching every city in the country (American Civil Liberties Union 2026). This infrastructure is announced by design. Deterrence is part of the product, and deterrence requires visibility: the pole placements at eye line, the vendor’s public boasts about the network’s scale, and the fact that residents can see and map the devices from the street all communicate the same sentence to everyone who enters the covered space. You are being watched, continuously, by an organization, and a record is being kept.

For most residents that sentence is wallpaper. For a definable class of people with psychiatric disabilities, it is the exact content of the condition, delivered by the environment, on official letterhead: for the paranoia spectrum it is the persecutory belief stated as municipal fact, for posttraumatic hypervigilance it is the threat cue installed at every entrance, and for social anxiety and agoraphobia it is the feared exposure made literal, continuous, and archived. Part IV develops the clinical mechanism in detail; the short version is that the treatment which makes public space usable for this population depends on the outside world disconfirming the

persecutory belief, and an environment engineered to announce organizational observation cannot disconfirm it. The barrier this creates has the structure of the staircase. It is uniform on its face. It is unequal in what it extracts. And it is harder to see than the staircase, because a staircase can be photographed as an obstacle, while a camera photographs everything except its own effect.

The thesis of this article is that the argument Whaley and colleagues make for concrete transfers to cameras without modification, because the legal standard they invoke was never about concrete. Title II of the ADA reaches the public right of way as a service, program, or activity of the city, the governing measure is meaningful access rather than formal openness, and a facially neutral feature of the environment that forecloses access for a protected class is precisely what that measure exists to catch. Part II states the argument as Whaley and colleagues leave it, including the enforcement record, the practitioner accounts that give the survey its texture, and the older entitlement the whole line descends from. Part III describes the camera barrier with the same specificity the curb ramp literature demands of concrete. Part IV establishes the affected class and the clinical mechanism, defining the class by shared mechanism rather than by diagnosis, walking its wings from the paranoia spectrum through trauma and the scrutiny fears, and tracing the treatment architecture the announced network dismantles. Part V places the extension on the statutory ground the curb ramp cases secured, in six steps, and explains why the claim runs on meaningful access rather than on a freestanding disparate impact rule. Part VI answers five objections, Part VII states the limits, and Part VIII names the work that follows.

II. THE ARGUMENT AS WHALEY AND COLLEAGUES LEAVE IT

The Whaley article does four things this extension depends on, and it is worth being precise about each, because the extension inherits its strength from theirs.

A. *The Doctrinal Settlement*

First, the article consolidates the settlement that the public right of way is itself a program of the city. The authors build on two cases they treat as particularly instructive. In *Culvahouse v. City of LaPorte*, 679 F. Supp. 2d 931 (N.D. Ind. 2009), two residents with disabilities sued over sidewalks in such disrepair that using them was difficult or impossible, and the city answered with a familiar trio: the sidewalks are not a service, program, or activity at all; if they are, adjacent property owners bear the repair duty; and if the city bears it, the cost is an undue burden. The court rejected all three, holding the sidewalks to be a covered program, placing the maintenance duty on the city under state law, and finding the undue burden defense unproven (Whaley et al. 2024). In *Cohen v. City of Culver City*, 754 F.3d 690 (9th Cir. 2014), the city permitted a car show vendor's display to block the curb ramp serving a disabled pedestrian's route, and defended on the ground that a marginally longer alternate route existed. The Ninth Circuit reversed summary judgment for the city, holding that a compliant sidewalk rendered noncompliant through the city's own event oversight violates the statute, and that the longer route does not excuse the violation (Whaley et al. 2024).

The appellate anchors sit one shelf higher, and the extension will stand on them. In *Barden v. City of Sacramento*, 292 F.3d 1073 (9th Cir. 2002), the Ninth Circuit held that public sidewalks are a service,

program, or activity of the city within the meaning of Title II and Section 504, so that the program accessibility regulations apply to them. The court declined to sort municipal functions one by one into covered and uncovered bins, reasoning that the statute’s language brings within its scope “anything a public entity does,” and that the inquiry asks only whether the function is a normal function of a governmental entity, which maintaining the right of way plainly is. In *Frame v. City of Arlington*, 657 F.3d 215 (5th Cir. 2011) (en banc), the Fifth Circuit, sitting en banc, held that Title II and Section 504 unambiguously extend to newly built and altered public sidewalks, in a private suit by residents who use wheelchairs that the en banc court allowed to proceed. The en banc court’s reasoning reached past the concrete to what the concrete is for. Sidewalks, it observed, are general government services provided in common to all citizens, and they are also traditional public fora that time out of mind have hosted assembly and discourse, so that a city which makes its sidewalks inaccessible denies disabled residents “the benefits of safe transportation and a venerable public forum.” The question whether the street itself is covered has been asked and answered, at the en banc level, in more than one circuit.

B. The Enforcement Record

Second, the article documents that formal entitlement and actual access have diverged for more than three decades, and the documentation is what separates the survey from a recitation of doctrine. New York, a state the authors note is considered progressive, with an antidiscrimination law that reaches disability and a statute requiring streets and sidewalks to be constructed or renovated for reasonable access by pedestrians with disabilities, reports 82 percent of state owned sidewalks and 66 percent of curb ramps meeting ADA requirements (Whaley et al. 2024). Read as an access statistic, the figure means a wheelchair user cannot count on completing an arbitrary trip even in the jurisdiction the authors chose as the strong case. Atlanta is the weak case, and it is worse. The city entered a Department of Justice settlement in 2009 committing it to full and equal access to its rights of way; nine years later a class action was filed on behalf of residents alleging the city continued to neglect deteriorating sidewalks, curb ramps, and pedestrian rights of way, with one survey finding roughly 20 percent of city sidewalks accessible to wheelchair or scooter users and roughly 30 percent equipped with curb ramps, the city having along the way dropped a planned 40 million dollars for sidewalk upgrades and reduced 35 million dollars for curb cuts to 5 million (Whaley et al. 2024). The pattern the authors extract is priority rather than poverty. Access loses the budget fight even when a federal settlement sits in the file. The scholarship has long treated that gap as structural, a limit of the antidiscrimination model itself rather than a local failure of will (Bagenstos 2004).

C. The Practitioner Accounts

Third, the article grounds the record in the accounts of people who litigate it. Twenty-two stakeholders were interviewed for the underlying project, eight of them attorneys, and their descriptions converge on a single texture: cities meeting access claims with responsibility shifting, procedural defenses, and delay. One attorney described a city arguing it could not stop a utility from placing a power pole in the middle of a sidewalk, while simultaneously assigning sidewalk maintenance to adjacent property owners, so that the entity operating the right of way disclaimed control over both the obstacle and the repair, the practitioners

answering that the ADA’s duty is non-delegable (Whaley et al. 2024). Another described Baltimore sidewalks so degraded that attendees of an annual disability rights conference could not travel from curb ramp to curb ramp. The accounts matter to this article for a structural reason that will return in Part III: the practitioners’ recurring adversary is infrastructure installed in the right of way by arrangement with third parties, which the city then characterizes as beyond its administrative reach. The camera networks of Part III are installed in the right of way by arrangement with third parties. The characterization will be familiar, and so will its answer, because Title II’s methods of administration rule reaches what a public entity does directly or through contractual or other arrangements (28 C.F.R. § 35.130(b)(3)).

D. The Material Neutral Engine

Fourth, and most importantly for what follows, the article’s normative engine is material neutral even though its subject matter is material. Nothing in the argument depends on the barrier being made of concrete. The argument depends on three properties: the barrier sits in the public right of way, it is facially neutral, and it forecloses use of that right of way for a class the statute protects. Stairs, heaved slabs, absent ramps, and snow deep enough to stop a chair happen to instantiate those properties in matter. The authors never claim the class of qualifying barriers is closed, and the statute they enforce affirmatively says otherwise: Congress’s own findings list “the discriminatory effects of architectural, transportation, and communication barriers” in a single breath (42 U.S.C. § 12101(a)(5)), placing a communicative barrier class beside the architectural one in the ADA’s foundational text. The authors’ framing, access in fact rather than in theory, is an instruction to look at effects rather than at materials.

The instruction has deep roots and recent precedent. Two decades before the ADA, tenBroek named the entitlement at stake the right to live in the world, and made the disabled person’s title to be abroad in public the measure of the law’s adequacy (tenBroek 1966). The right has been extended off the pavement before: Areheart and Stein argued that the paradigmatic right to live in the world naturally encompasses a right to live in the Internet, pressing the access framework into a barrier class with no mass at all (Areheart and Stein 2015). This article makes the same style of move in the opposite direction: the barrier examined here stands in the oldest covered space there is, and only its material is new.

What the survey does not reach, because no survey of architectural enforcement would, is the barrier class that entered the public right of way while the ramps were being litigated. That is the subject of the next Part.

III. A BARRIER MADE OF CAMERAS

The curb ramp literature earned its doctrinal victories by being concrete about concrete: slope gradients, detectable warning surfaces, transition plans, snow clearance schedules. The surveillance layer deserves the same specificity. It has four properties that matter here, and each is a design feature rather than an accident.

A. Dense and Networked

Automated license plate readers photograph every passing vehicle, convert the plate and the vehicle's distinguishing features into a searchable record, and pool those records across jurisdictions into a queryable map of movement. The largest vendor's own figures describe the scale: more than 20 billion scans per month across more than 5,000 communities, with a stated corporate objective of a camera network in every city in the United States (American Civil Liberties Union 2026). Independent mapping confirms the density is legible from the street. The crowdsourced DeFlock project, which locates readers by resident observation, had mapped roughly 80,000 devices nationally by February 2026 (Whittaker 2026) and roughly 119,000 by midsummer (Fox News 2026), a spread that reflects both network growth and mapping coverage and that brackets, rather than resolves, the true count. The networks extend past police departments to neighborhood watch groups and other private customers, so that the covered zone is stitched from public and private segments a pedestrian cannot distinguish (American Civil Liberties Union 2026).

B. Announced by Design

This is the property the rest of the argument turns on. A hidden camera deters no one. The deterrence theory of this infrastructure requires that residents know it is there, and the record shows they do. The vendor boasts of the network's scale in public (American Civil Liberties Union 2026). The devices sit at eye line on dedicated poles distinctive enough that residents have located and mapped well over a hundred thousand of them by sight (Fox News 2026). Dozens of cities have rejected the cameras after public debate, a nationwide opposition movement has organized against the deployments, and a wave of vandalism against the readers spread across the country in early 2026 (American Civil Liberties Union 2026; Whittaker 2026). Whatever else that record shows, it shows that the network is noticed, which is the network's intent. The infrastructure speaks, and what it says, accurately, is that an organization is watching this space continuously and keeping records of who moves through it.

C. Retentive and Organizational

The observer is no passerby whose attention lapses. It is a networked institutional system with memory, search, alerting, and interagency sharing, whose records describe where a given vehicle has been over time. The reader on the pole is the visible terminal of an organizational apparatus, which is to say the infrastructure instantiates precisely the kind of observer that, as Part IV establishes, sits at the apex of the clinical severity hierarchy: an organization, conducting continuous coordinated observation, with records.

D. Uniform on Its Face

The cameras photograph every vehicle. The announcement addresses every resident. No statute of exclusion attaches to any diagnosis, and no one is turned away at the edge of the covered zone. The infrastructure is, in exactly the staircase's sense, perfectly evenhanded, and the staircase teaches what that evenhandedness is worth. A barrier's neutrality has never answered the question the ADA asks, which is what the barrier costs, and whom. The next Part identifies the class for whom this infrastructure's cost is categorically different, and

traces the mechanism through which an announcement that reads as wallpaper to most residents reads, to them, as the closing of the door.

IV. THE CLASS AND THE MECHANISM

A. A Class Defined by Mechanism Rather Than Diagnosis

The ADA does not protect diagnoses; it protects people whose impairments substantially limit major life activities, a definition that is functional by design. The class this article concerns should be defined the same way, by the mechanism that connects the impairment to the barrier, because the mechanism is what the four populations described below share. Each is a condition in which observation, scrutiny, or ambient threat is the clinical content; in which avoidance of public and shared space is the characteristic behavioral consequence; and in which the evidence based treatments run through a single channel, returning to the feared situations so that the world can disconfirm the feared outcome. Where those three features hold, an environment engineered to announce continuous organizational observation interacts with the disability in a way it does not interact with anyone else's trip to the store. The populations are the paranoia spectrum through its severe end in persecutory delusions, posttraumatic stress disorder with its hypervigilance and avoidance architecture, and the scrutiny fears, social anxiety disorder and agoraphobia. This is no boutique class. Roughly half of Americans meet criteria for a mental disorder at some point in life (Kessler et al. 2005), and suspicious thoughts about the intentions of others are common in the general population rather than confined to any clinic (Freeman et al. 2005). The claim's constituency is measured in millions, and its sharpest edge, developed below, is the population for whom the mechanism forecloses public space entirely.

B. The Paranoia Spectrum

Paranoia is dimensional. Suspicious thoughts about the intentions of others are common, and in a nonclinical sample of more than a thousand respondents, such thoughts were found to be arranged hierarchically, building on ordinary interpersonal worry and social anxiety at the base and ascending, as conviction and the severity of the feared harm increase, through ideas of reference toward persecutory thinking; at the apex of the hierarchy, held by the fewest people and with the greatest distress, sit beliefs about severe harm pursued by organizations and conspiracies (Freeman et al. 2005). The hierarchy matters twice over. It establishes that the spectrum's base sits in the general population, so the class thins gradually rather than ending at a diagnostic wall, and it establishes that the content at the apex, coordinated organizational observation directed at oneself, is the content the infrastructure of Part III announces to every resident as a factual condition of the street.

At the severe end are persecutory delusions, threat beliefs held with strong conviction that others intend harm. They are among the most common presentations of psychosis; more than 70 percent of patients presenting with a first episode of psychosis have a persecutory delusion, roughly half of the people who hold such delusions register psychological wellbeing in the lowest 2 percent of the general population, and psychiatric hospitalization is a common consequence (Freeman 2016). Their disabling force runs directly through public space. When a person believes harm is imminent, being around other people becomes extremely difficult, and withdrawal from shared space is a signature consequence of the belief (Freeman

2016). A review of the causal architecture identifies the same proximal factors across the spectrum, a worry thinking style, negative beliefs about the self, interpersonal sensitivity, sleep disturbance, anomalous internal experience, and reasoning biases, each with mechanistic links to paranoia (Freeman and Garety 2014). And the effect of public space itself on this population has been measured directly. In the Camberwell walk study, thirty patients with persecutory delusions were randomized to time in a deprived urban environment or to a brief mindfulness task; the urban exposure increased anxiety, negative beliefs about others, the jumping to conclusions bias, and paranoia itself (Ellett, Freeman, and Garety 2008). Public space was already clinically loaded for this population before a single reader went up; the announced network loads it further, on purpose, with the specific content the apex of the hierarchy fears. This wing of the class is where the mechanism operates at full foreclosure, and it anchors the legal claim for that reason; the wings that follow widen the class the barrier burdens.

C. Trauma and Hypervigilance

Posttraumatic stress disorder is, on the leading cognitive model, a disorder of current threat: the person processes the trauma and its aftermath in a way that produces a sense of serious threat operating now, and the sense of present danger drives the disorder's signature arousal symptoms, among them hypervigilance, the continuous scanning of the environment for cues of the feared harm (Ehlers and Clark 2000). The model's account of maintenance is the one this article has already met twice. The person manages the sense of threat through avoidance and safety seeking behaviors, and those strategies maintain the disorder precisely because they prevent change in the threat appraisal; the situations that would disconfirm the danger are never entered, so the danger never updates (Ehlers and Clark 2000). Treatment accordingly requires reclaiming the avoided territory, entering the situations the trauma marked so that the appraisal of current threat can be corrected against a world that does not deliver the harm.

Now place a person with this architecture at the edge of the covered zone. Hypervigilance is a cue detection system, and the announced network is a field of genuine cues: labeled observation devices at eye line, at every entrance, backed by public boasts and news coverage confirming that watching is occurring and records are being kept. For the subset whose trauma involved being followed, monitored, watched, or tracked, survivors of stalking and intimate partner surveillance among them, the announcement does not resemble a threat cue; it is the modality of the original harm, reinstalled by the municipality along every route the person might use to reclaim ordinary life. The appraisal of current threat that treatment exists to correct is, within the covered zone, no longer a distortion the world can falsify. The world now stipulates: you are being tracked here. The exposure exercise cannot return its therapeutic answer, because the answer the environment returns is the trauma's.

D. Scrutiny and the Audience Made Actual

Social anxiety disorder is built on scrutiny. On the standard cognitive behavioral models, the person entering a social situation forms a mental representation of themselves as seen by an audience, allocates attention to monitoring that imagined observation, and appraises the probability and cost of negative evaluation; the

disorder's engine is the felt presence of an evaluating audience, and its behavioral output is avoidance of the situations where the audience convenes (Clark and Wells 1995; Rapee and Heimberg 1997). Agoraphobia generalizes the avoidance to public space as such: marked fear of situations like open spaces, crowds, and being outside the home alone, with the situations avoided or endured under intense distress (American Psychiatric Association 2022). For these conditions, the therapeutic wager is the same wager the rest of the class makes. Enter the situation, and let the audience fail to materialize as feared.

The announced network changes what materializes. The imagined audience of the social anxiety model was a construction the situation could underperform; people are usually paying less attention than the sufferer fears, and discovering that gap is how exposure heals. A recorded street closes the gap from the other side. The observation is no longer a probabilistic social inference to be tested and corrected; it is continuous, mechanical, announced, and archival, an audience that never looks away and never forgets, whose attention is the advertised feature of the space. The scrutiny fear does not need to be irrational to be disabling, and after the announcement it is not irrational. It is the design.

E. The Shared Treatment Architecture

The class's conditions are treated by different protocols with one common load bearing wall. Freeman's distillation for the persecutory end is that safety has to be relearned, by entering the feared situations after the influence of the maintaining factors has been reduced (Freeman 2016). Ehlers and Clark's account of trauma treatment requires correcting the appraisal of current threat by reclaiming avoided situations (Ehlers and Clark 2000). The scrutiny fears are treated by exposure to the evaluative situations themselves (Clark and Wells 1995; Rapee and Heimberg 1997). The mechanism the wall rests on has a name in the exposure literature. Fear structures change when the situation delivers corrective information, input incompatible with the expectation the structure encodes (Foa and Kozak 1986), and the modern inhibitory learning account sharpens the requirement to expectancy violation: exposure works to the degree the outcome differs from what the person predicted, the mismatch being the engine of new learning, and the removal of safety signals being among its core strategies (Craske et al. 2014). Reasoning focused work makes the common wall explicit. In the Maudsley Review Training Programme pilot, thirteen participants with persistent, high conviction delusions completed a training package built around generating and weighing alternative explanations for ambiguous events; the study measured gains as increased belief flexibility and reduced delusional conviction, with conviction reductions in roughly 62 percent of participants immediately after training, against far lower rates in comparable prior work (Waller et al. 2011). The pilot's own published participant statements capture the predicament this article names, fifteen years early. One participant, exercising the trained skill of holding alternatives open, reasoned: "There are issues with liberties and civil rights. The noises I hear could be a sign I'm under surveillance, but they could also be hallucinations or the neighbours" (Waller et al. 2011). The paper records the statement as evidence of improved belief flexibility, and it is; the exercise works because in 2011 the surveillance explanation and its rivals were live alternatives the street could still adjudicate. Across every wing of the class, the architecture of care routes through one channel: the outside world must be available to return an answer that loosens the condition's grip.

F. What the Announced Network Does to the Channel

Now assemble the pieces, wing by wing. At the paranoia spectrum's severe end, the canonical content is that an organization is watching, tracking, and keeping records (Freeman et al. 2005), and the clinician's traditional move was reality testing in the plain sense: go outside, look, and let the street fail to contain the feared apparatus. In a right of way saturated with announced automated license plate readers, the street contains the feared apparatus, labels it, and boasts about it in public. Organizational observation of the person's movements is no longer a hypothesis reasoning training can dissolve; it is the published, marketed, accurately described condition of the space. Where the ambient signals of a 2011 street could be surveillance, hallucination, or the neighbours, the labeled reader at a 2026 neighborhood entrance has a marketing department. For the trauma wing, the same announcement is cue installation: the network places genuine, labeled instances of the threat modality at every threshold of the territory treatment needs the person to reclaim, and for those whose trauma was itself surveillance, it reinstates the harm's mechanism as municipal infrastructure. For the scrutiny wing, the announcement converts the imagined audience into an actual one with perfect attendance and permanent memory. Three wings, one conversion: the disconfirmation channel, the single wall all the treatments lean on, is closed by the same announcement in three different clinical dialects. In the exposure literature's terms, the covered zone is engineered against expectancy violation: the prediction of being watched is guaranteed there rather than testable, and an exposure exercise that cannot produce a mismatch cannot produce new learning (Foa and Kozak 1986; Craske et al. 2014).

The conversion also feeds back into the maintenance processes themselves. The jumping to conclusions bias operates on the environment's signal composition, and the announced network changes the composition: it seeds the environment with genuine observation apparatus, so that the fast resolution of ambiguity toward threat is now, some meaningful fraction of the time, correct (Waller et al. 2011). Avoidance and safety seeking, the behaviors that maintain every condition in the class (Freeman 2016; Ehlers and Clark 2000), are now also the behaviors the announcement is engineered to produce; deterrence and symptom maintenance have the same output. A system designed to make the generally law abiding public feel watched is, for this class, a system that administers the maintaining conditions of the disability at every threshold of the covered zone.

G. The Class and the Injury, Stated Precisely

Three clarifications sharpen what follows. First, the claim is about a definable class and a specific mechanism; it is a statement about what the environment now extracts from the class that it does not extract from others. Most residents pay for this infrastructure in diffuse privacy. This class pays in the currency of the one intervention that made public space usable, and, downstream, in the public space itself. Second, the injury is not that the cameras cause the disabilities. The disabilities precede the cameras. The injury is exclusion, and it runs on a gradient the law already knows how to hold: at the severe end of the paranoia spectrum and for surveillance modality trauma the mechanism forecloses, while farther down the hierarchy and across the scrutiny fears it burdens, deters, and taxes, and Part V's meaningful access standard is built to measure exactly that difference, because a staircase also forecloses some users completely while merely punishing

others. Third, the person at the sharpest edge has the same functional relationship to the covered street that a wheelchair user has to a flight of stairs. The route exists. The person cannot take it. The law has a name for that relationship, and the next Part applies it.

V. SAME STATUTE, SAME STANDARD

The doctrinal argument proceeds in six steps, each of which the curb ramp litigation has already secured in its physical form.

A. *The Right of Way Is the Program*

Title II of the ADA provides that no qualified individual with a disability shall, by reason of such disability, “be excluded from participation in or be denied the benefits of the services, programs, or activities of a public entity, or be subjected to discrimination by any such entity” (42 U.S.C. § 12132). The Supreme Court reads the phrase without carving exceptions. In *Pennsylvania Department of Corrections v. Yeskey*, 524 U.S. 206 (1998), the Court held that state prisons fall within the statute’s plain text, declining to exempt even the institution a state would most confidently have thought its own; where the statutory language reaches an activity, the activity is covered. And in *Tennessee v. Lane*, 541 U.S. 509 (2004), the Court sustained Title II as valid enforcement legislation in a case whose facts are the physical version of this article’s thesis: George Lane, a wheelchair user summoned to answer criminal charges, crawled up two flights of courthouse stairs to reach his courtroom, and when he refused to crawl again or be carried at a later appearance, he was arrested for failure to appear. The building was formally open to him. The stairs closed it. The Court’s recognition that Title II enforces the right of access to the institutions of public life is the constitutional floor under everything that follows.

Barden and *Frame*, described in Part II, settle that the right of way itself is among the covered programs. *Barden* treated the maintenance of public sidewalks as a normal function of the city and therefore a covered service; *Frame*, en banc, held the statutes unambiguously extend to newly built and altered sidewalks and grounded the holding in what the right of way is for, safe transportation and the venerable public forum. The implementing regulations complete the frame: a public entity must operate each service, program, or activity so that, viewed in its entirety, it is “readily accessible to and usable by individuals with disabilities” (28 C.F.R. § 35.150(a)), the provision *Barden* held applicable to the sidewalk network (28 C.F.R. §§ 35.149–35.151). The program at issue in this article is the same program at issue in the curb ramp cases: the city’s provision of usable public mobility through its streets, sidewalks, and rights of way.

B. *The Measure Is Meaningful Access*

The governing measure of access is meaningful access. In *Alexander v. Choate*, 469 U.S. 287 (1985), the Supreme Court held that an otherwise qualified individual with a disability “must be provided with meaningful access to the benefit” the covered entity offers, that the benefit “cannot be defined in a way that effectively denies otherwise qualified handicapped individuals the meaningful access to which they are entitled,” and that reasonable accommodations may be required to assure that access. *Choate* is a two edged holding, and

the extension proposed here respects both edges, because the second edge is what disciplines the pleading. The Court declined to read Section 504 as converting every disparate impact showing into a prima facie case, rejecting what it called the boundless version of that theory while assuming the statute reaches at least some conduct with an unjustifiable disparate impact, and it sustained Tennessee’s neutral fourteen day Medicaid limit because the limit left disabled recipients with meaningful access to the benefit as defined. The lesson is structural: the claim that survives *Choate* is framed as denial of meaningful access to a covered benefit, remedied through the statute’s own modification machinery, rather than as a naked statistical grievance against a neutral policy. Part IV supplies exactly what *Choate* demands and the failed Medicaid claim lacked: a mechanism by which the neutral feature forecloses the benefit itself for the class, rather than merely serving the class less generously.

C. Method of Administration, Not Benefit Definition

The sharpest countermove available to a defendant city runs through *Choate*’s other edge: characterize camera coverage as part of the definition of the benefit, a surveilled street being simply the street the city offers, the way fourteen days of inpatient coverage was simply the Medicaid benefit Tennessee offered. If the characterization holds, the disabled resident is receiving the same defined benefit as everyone else, and *Choate* shields it.

The characterization fails on the statute’s own sorting. Tennessee’s durational limit defined the quantum of the thing provided; there was no fourteen day benefit standing apart from the number. A street stands entirely apart from its camera coverage. The benefit the mobility program provides, passage, is complete without a single reader, was provided for a century before the first one, and continues identically in the thousands of communities that have declined or canceled deployments. Camera coverage is something the city does to the program in the course of running it, adopted by policy, calibrated by policy, marketed as administration, in the express service of an administrative goal, deterrence. The regulations have a category for that, and it is not benefit definition. A public entity may not, “directly or through contractual or other arrangements, utilize criteria or methods of administration” that have “the effect of subjecting qualified individuals with disabilities to discrimination on the basis of disability” (28 C.F.R. § 35.130(b)(3)(i)). An announced, deterrence driven surveillance mesh over the pedestrian and vehicular right of way is a method of administering the public mobility program if anything is, and the contractual arrangements clause anticipates the vendor structure precisely: the practitioner account in Part II, of a city disclaiming power over third party infrastructure planted in its own sidewalk, is the move the clause exists to foreclose.

D. The Modification Machinery

The methods of administration rule addresses how the city runs what it has; the reasonable modification rule addresses what the city can be asked to change. A public entity must make “reasonable modifications in policies, practices, or procedures when the modifications are necessary to avoid discrimination on the basis of disability,” unless it demonstrates that the modification would fundamentally alter the nature of the service (28 C.F.R. § 35.130(b)(7)(i)). Announcement policy, signage siting, camera density and placement, retention

periods, coverage disclosure, and the zoning of covered and uncovered pedestrian routes are policies and practices in the regulation's plain sense, every one of them adopted by decision and revisable by decision. The modification conversation this article contemplates therefore has a wide palette between full deployment and removal, and Part VI returns to it under the fundamental alteration defense. What matters at this step is only that the machinery reaches the barrier: the features of the surveillance layer that do the excluding are, without exception, policy artifacts.

E. The Funding Hook Their Survey Documents

The Whaley survey supplies one further transferable structure. The authors trace how federal transportation statutes, the Federal-Aid Highway Act and the Urban Mass Transportation Act among them, established minimum standards for accessible public spaces, how the Access Board's Public Rights-of-Way guidelines were nearing final adoption as they wrote, and how sovereign immunity gives way when the money is taken: quoting *Garcia*, they note that Congress, when providing funds from the federal purse, may condition acceptance of those funds on a state's agreement to waive its immunity, which is the structure of Section 504 (Whaley et al. 2024; 29 U.S.C. § 794). Wherever the right of way takes federal money, the extension inherits the hook exactly as the curb ramp cases used it: a street that cannot lawfully be rebuilt without a ramp because federal money flows through it is a street whose administration is answerable under Section 504 as well as Title II, with the two statutes interpreted in *pari materia*, as *Frame* confirms. Nothing in this step depends on the cameras themselves being federally purchased; the program receiving the assistance is the right of way, and the claim addresses how that program is administered.

F. What Transfers from the Curb Ramp Litigation

Assembled, the extension is short. The city's streets and sidewalks are its program of public mobility (*Barden*; *Frame*). The measure of a disabled resident's access to that program is meaningful access (*Choate*). For residents in the class Part IV defines, the announced surveillance layer denies meaningful access through the mechanism established there: it closes the disconfirmation channel on which every treatment pathway connecting this class to public space depends, foreclosing use at the class's severe edge and taxing it everywhere else. The foreclosure is actionable through the methods of administration and reasonable modification regulations, which is where the argument about announcement calibration, density, retention, and coverage will be had. And the defense that suggests itself first, that the street is formally open to everyone and the cameras photograph everyone alike, is the argument the curb ramp cases already retired. A sidewalk without a ramp is formally open to a wheelchair user in exactly the sense that a downtown saturated with announced readers is formally open to a person with persecutory schizophrenia or to a stalking survivor whose trauma was being tracked, and in exactly the sense that the Polk County courthouse was formally open to George Lane. The law erects no barrier, and the environment erects a complete one. Title II measures access by function, which is the entire teaching of *Choate*, of the program access regulations, and of *Frame*'s observation that inaccessibility denies the disabled resident a venerable public forum.

One further transfer deserves notice because it maps the injury's temporal shape. *Frame* held that the

claim accrues when the plaintiff knew or should have known they were being denied the benefits of the sidewalks, a deterrence sensitive trigger that recognizes exclusion as something a person experiences from outside the space, before and without ever entering it. That recognition fits the present class exactly, because the exclusion here consists precisely in informed avoidance. The announcement does its deterrent work at the threshold, which is where the class encounters it; the injury is administered fresh every time the person decides, accurately informed by the network's own public record, that the street is not usable for them. A doctrine that already counts staying home as the experience of denial requires no stretching to count it here.

VI. OBJECTIONS

A. Everyone Is Surveilled

The objection observes that the cameras photograph every vehicle and the announcement addresses every resident, so no one is singled out. This is the staircase defense, and it fails here for the staircase reason. Uniform application has never answered the ADA's question, which is about cost, and the cost is radically unequal. The class Part IV defines pays for this infrastructure with the collapse of the clinical channel that made public space usable; other residents do not. The general population effect is real and measured: perceived surveillance suppresses willingness to voice minority views online (Stoycheff 2016), and the legal literature carries a developed account of surveillance's suppression of lawful activity under the name of the chilling effect (Penney 2022). The class claim is that mechanism run at clinical gain. What chills the median resident's speech closes this class's streets. Naming the differential is why Part IV runs through the treatment literature rather than through privacy theory: the claim is a claim about a protected class's access, on the class's own terms, under the class's own statute. The privacy debate about this infrastructure is real and important, and this article takes no position in it, because the disability claim does not need it. The wheelchair user's claim against the staircase never depended on whether stairs were, all things considered, good architecture.

B. The Cameras Are Accurate, So the Belief Is Not Delusional

The objection reasons that if organizations really are watching, the person's belief is true, and a true belief needs no accommodation. The objection mislocates both the diagnosis and the injury. The diagnosis does not rest on the single proposition that cameras exist; persecutory delusions are threat beliefs about intended harm, held with conviction, maintained by the processes Part IV describes, and their disabling force lies in the conviction, the distress, and the behavioral withdrawal they drive (Freeman 2016). A person does not exit the diagnostic class because the environment begins supplying accurate premises for the threat inference. What the accurate announcement destroys is the treatment pathway. Reality testing and belief flexibility training work by letting the world return an answer that loosens conviction (Waller et al. 2011); an environment that stipulates to organized observation returns the other answer, on every trip, with official provenance. Accuracy is the mechanism of the barrier rather than a defense to it. Indeed, the accuracy objection concedes the factual premise the claim needs: the announcement is true, is made by the public entity, and is received exactly as designed. And the objection, even if it worked, would reach only one wing of the class. Posttraumatic

hypervigilance and the scrutiny fears never depended on a false belief; they are disorders of threat appraisal and evaluative fear, and their diagnostic status is untouched by the environment supplying accurate premises. The objection has no purchase on most of the class and mislocates the injury for the rest.

C. The Barrier Is Not Physical

A court might balk at a barrier with no mass: the wheelchair user cannot roll up the stairs, the objection runs, while nothing physically stops this plaintiff at the covered zone's edge. The objection has the statute's own findings against it. Congress listed "the discriminatory effects of architectural, transportation, and communication barriers" side by side in the ADA's foundational text (42 U.S.C. § 12101(a)(5)), and the announced network is a communicative artifact by design; its exclusionary work is done entirely by what it tells the people who encounter it. The objection also has the case law's method against it. Title II measures access by function, and the functional test has never required mass. *Frame's* accrual holding, discussed above, already treats deterred nonuse as the experience of denial; *Cohen* found a violation in an arrangement of the environment the plaintiff could in principle have detoured around; and the effective communication regulations elsewhere in Part 35 impose affirmative obligations that concern information rather than matter. A barrier is what a barrier does. The stairs stop the chair; the announcement stops the person; the program is equally unreachable behind either.

D. Removing the Cameras Would Fundamentally Alter Public Safety

The fundamental alteration defense under § 35.130(b)(7)(i) is real, and it disciplines the remedy rather than defeating the claim. The claim's object at this stage is recognition that a barrier exists and that the modification conversation is owed. The remedial palette between full deployment and removal is wide: announcement calibration and signage siting, density and placement review for residential pedestrian zones, retention limits, disclosure of coverage maps sufficient to allow planning of usable routes, and unannounced zone design in areas of low enforcement value are all modifications of policies and practices in the regulation's sense, none of which abolishes the program, and the rejection votes of the past two years show every one of these settings already treated as an ordinary municipal choice (American Civil Liberties Union 2026; Whittaker 2026). Which of them is reasonable, and where the alteration line sits, is exactly the litigation the statute contemplates, and it is the same litigation the cities of the curb ramp cases were required to have about budgets, transition plans, and snow. What the defense cannot do is what the *Culvahouse* defendant attempted with undue burden: substitute for the merits. And the defense carries an awkward passenger here, because the same municipal record that would prove the network's public safety value is a record of the announcement working as designed, which is to say a record of the mechanism.

E. This Proves Too Much

If announced surveillance is a barrier for this class, the objection runs, then any feature of public space that interacts badly with any diagnosis becomes an ADA claim: streetlights and photophobia, noise and sensory processing, the mere presence of crowds. The containment does not come from narrowing the class, because

the ADA's class was never narrow; the definition is functional, and Part IV defines the class functionally on purpose. The containment comes from what qualifies as the barrier, and the limits are the same ones that contain every Title II claim. The excluding feature must be a policy artifact, something a public entity adopted and can revise; a claim against weather, or against the fact that other people exist, fails here because nothing revisable is doing the excluding, while every excluding feature of the surveillance layer, from pole siting to announcement to retention, is a decision. The mechanism must be documented rather than asserted, and Part IV's mechanism runs through the published treatment literature of every wing of the class. And the showing must reach the meaningful access standard, foreclosure at the claim's core rather than mere friction, with *Choate* itself capping the theory by refusing the boundless disparate impact reading, which is why Part V frames the claim through meaningful access and the modification machinery rather than through impact statistics. Few features of the environment satisfy that conjunction: a deliberate, adjustable policy artifact, a documented clinical mechanism, and foreclosure doing the work at the core. This one satisfies all three, which is less a warning about the slope than a measure of how unusual this barrier is.

VII. LIMITATIONS

This article establishes a conceptual and doctrinal extension, and its boundary should be stated plainly. It does not run the claim through the circuits. Standing mechanics, class definition, the interaction of deterrence standing with pleading standards, sovereign immunity postures beyond the funding waiver, and the split risks that attend any Title II theory are the work of a doctrinal companion, and nothing here should be read as a litigation map. It does not measure prevalence. The exclusion mechanism is derived from the clinical literature on the maintenance and treatment of the class conditions; the population level rate at which announced surveillance produces informed avoidance of covered spaces, and how that rate distributes across the class's wings and down the severity gradient, are empirical questions this article motivates and does not answer, and the deployment figures reported in Part III are presented as a bracket across sources and months rather than as a settled count. It rests on *Choate*'s meaningful access standard, which is a ceiling as well as a floor: *Choate* sustains neutral benefit definitions against demands for more favorable treatment, and Part V's answer to the benefit definition countermove, though built from the regulation's own categories, has not been tested in a courtroom. Finally, the specific propositions relied on were verified against the opinions themselves; full citator runs on every anchor, standard work before any filing, belong to the doctrinal companion rather than to this article. The claim of novelty is bounded in the same spirit: searches of the legal and clinical literatures found no prior application of the Title II meaningful access framework to surveillance infrastructure, but the intersection may be occupied somewhere the searches did not reach, and the article's framing as an extension of the nearest work is built to survive that discovery.

VIII. FUTURE WORK

Two projects follow directly, each answering a named gap. The first answers the doctrinal gap: a law review treatment that runs the claim through the circuits, builds the plaintiff architecture, and addresses standing, class mechanics, and defenses, extending the framework of this article into litigable form, including the

associational and organizational standing structures that let the class litigate without exposing individual members. The second answers the empirical gap: a study design pairing camera deployment maps, which Part III shows are publicly reconstructable from crowdsourced datasets, with measures of public space avoidance in persecutory spectrum populations, to estimate the exclusion rate the mechanism predicts and to test whether announcement salience, rather than camera presence alone, drives avoidance, as the mechanism implies it should. The salience prediction is the design's falsification handle: if avoidance tracks mere presence rather than announcement, the mechanism as stated here is wrong.

IX. CONCLUSION

Whaley, Martinis, Pagano, Barthol, Senzer, Williamson, and Blanck close their survey by observing that the ADA and the laws built around it worked a transformation in how law and society regard people with disabilities, recognizing them for the first time in the nation's history as full members of the constitutional We; the whole of their survey shows the recognition outrunning the pavement. This article has argued that the task is larger than the ramp backlog, because the barrier class is larger than concrete. While the field spent three decades litigating the material obstacles, a second infrastructure was installed over the same rights of way, one that announces itself by design and that, for a class running from the paranoia spectrum through posttraumatic hypervigilance to the scrutiny fears, dismantles the clinical bridge between the front door and the street. The class is real, is measured in millions, and was already fragile; the mechanism is documented in the treatment literature of each of its wings; the barrier is a policy artifact from pole to retention schedule; and the deployment continues toward the vendor's stated objective of every city in the country.

The extension asks for no new law. The right of way is already a program. The standard is already meaningful access. The modification machinery already exists, the funding hook is already attached, and the losing defense, that the barrier treats everyone alike, already lost when it was made of stairs, and lost again when George Lane was offered a courthouse he could enter only on his hands. All the argument asks is that the field see the newest barrier with the eyes it trained on the oldest one. The right at stake is the one tenBroek named sixty years ago: the right to live in the world. Their barriers are made of concrete. These are made of cameras. The statute has never once asked what a barrier is made of.

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