



FORMAL COMPLAINT | CHAPTER 9 DUTCH GENERAL ADMINISTRATIVE LAW ACT | 28 AUGUST 2026

Failure to handle and provide an administrative response concerning PULSE-TWIN

Independent English translation for public access. The Dutch complaint submitted on 28 August 2026 remains the authoritative document.

TO	Municipality of Heerlen - Municipal Executive - complaints coordinator
POSTAL ADDRESS	PO Box 1, 6400 AA Heerlen
EMAIL	gemeente@heerlen.nl
COPY	Mayor R. Wever - r.wever@heerlen.nl
FROM	Michel Peen - Heemskerk - home address and personal email redacted
DATE	28 August 2026

Conduct complained of: leaving the written administrative request to Mayor Wever of 29 July 2026 unanswered and without identifiable handling for almost a month, including after a reminder and a final formal warning.

Dear members of the Municipal Executive, dear complaints coordinator,

I hereby lodge a formal complaint pursuant to section 9:1 and following of the Dutch General Administrative Law Act and the Municipality of Heerlen Complaints Ordinance 2024. I expressly request immediate formal handling within the meaning of section 7(2) of that ordinance.

The complaint concerns the manner in which my request, addressed directly to Mayor R. Wever, for an administrative response concerning the PULSE-TWIN dossier was handled, or rather left unhandled. Despite a specific request, a reminder and a final warning, I received no substantive response, no information about circulation or handling, and no specific date on which answers would be provided.

1. Facts and chronology

29 July 2026 - original letter and research report

On 29 July 2026 I sent Mayor Wever my research report by email on AI, digital surveillance and data processing in Heerlen's public space, with particular attention to PULSE-TWIN and the Social Digital Twin. The email was sent to r.wever@heerlen.nl.

I requested acknowledgement of receipt, personal circulation to the relevant portfolio holders, the municipal secretary, the Data Protection Officer and the responsible policy and project teams, together with separate and verifiable answers to seven administrative questions. Those questions concerned, among other matters, the data sources and linkages used, AI and algorithmic

applications, influence on surveillance and enforcement, legal and fundamental-rights safeguards, risks of bias and self-reinforcing patterns, information for residents and democratic scrutiny by the municipal council.

20 August 2026 - reminder with a clear deadline

Because no response was received, I sent a reminder in the same email thread on 20 August 2026. I requested acknowledgement by Thursday, 27 August 2026, confirmation of whether the report had been circulated, and a specific timeframe for answering the seven questions.

27 August 2026 - final formal warning

When no response had been received on 27 August, I sent a final formal warning to Mayor Wever, copying gemeente@heerlen.nl. I announced that if no response was received, a formal complaint would follow on 28 August 2026. No further response deadline was granted.

27 August 2026 at 14:44 - automated response only

After the final warning, at 14:44 I received only a generic automated message from the Municipality of Heerlen Customer Contact Centre. It merely stated that my email had been received and would be handled as soon as possible.

That automated acknowledgement confirms that the final warning reached the municipality's general channel. It does not answer what happened to my original email of 29 July, confirm circulation, identify a handler or specific response date, or provide a substantive answer. Up to and including the date of this complaint, no substantive or concrete procedural response had been received.

2. Grounds of complaint

No timely and identifiable handling

A specific and substantiated administrative request sent directly to the mayor remained without acknowledgement or identifiable handling for almost a month. Even after the reminder, no information was provided about who was handling the request or what had happened to it.

No information about circulation

I expressly asked for the report to be brought to the attention of the relevant office holders and officials. The municipality did not confirm whether this circulation had taken place. The handling therefore could not be verified.

No substantive response or specific timeframe

The seven questions did not necessarily have to be answered in full immediately. A careful and accessible public authority could at least have acknowledged receipt, explained the handling and provided a specific response timeframe. Even that did not happen.

Automated acknowledgement does not remedy the earlier omission

The automated response of 27 August was generated only after the final warning was also sent to the municipality's general address. It is not a response from Mayor Wever, does not confirm handling of my original letter and is not a substantive disposition.

Careless and inaccessible administrative communication

Allowing a serious, factual and publicly relevant request to lapse into complete silence, despite a reminder and a clear deadline, is inconsistent with proper, transparent and accessible public administration. The absence of even basic procedural information forced me to seek follow-up repeatedly.

This complaint is not an objection to a decision and is not a notice of default for failure to decide in time. My letter of 29 July was not an application for a decision under the General Administrative Law Act. The complaint concerns only the manner in which the municipality and the mayor acted towards me in this matter.

3. Requests for formal handling

Registration and written acknowledgement

Register this letter as a formal complaint in the municipal case system and provide me with a written acknowledgement, a case number and the name or position of the person handling the complaint.

Immediate, formal and careful handling

Skip the informal telephone stage and handle this complaint formally without delay. Given the subject and the fact that the complaint also concerns an act or omission by the mayor, I ask the complaints coordinator to appoint a handler who has not been involved in this matter and, if necessary, to involve an internal or external complaints adviser.

Entirely written handling

I do not exercise the right to be heard orally. I request assessment on the basis of this complaint and the attached written material. All communications must take place exclusively in writing by email.

Reasoned findings and specific remedial measures

I request a written and reasoned decision setting out the findings, the assessment of each ground of complaint, and the conclusions or remedial measures the municipality attaches to them. In accordance with section 9:12 of the General Administrative Law Act, please identify the available ombuds facility.

Handling of the original administrative request

Separately from the complaint procedure, I again request written confirmation of what happened to my email and report of 29 July, whether they were circulated, and the specific date on which the seven questions will be answered separately and verifiably.

I assume that the complaint will be dealt with within the periods laid down in section 9:11 of the General Administrative Law Act and section 9 of the Municipality of Heerlen Complaints Ordinance 2024. I do not agree in advance to any delay beyond the legally permitted period.



Yours sincerely,

Michel Peen

Heemskerk

[home address and personal email address redacted]

Exhibits

Exhibit 1: Email to Mayor Wever of 29 July 2026, including the research report.

Exhibit 2: Reminder of 20 August 2026.

Exhibit 3: Final formal warning of 27 August 2026.

Exhibit 4: Automated acknowledgement of 27 August 2026 at 14:44, recorded in two screenshots.

Legal framework: sections 9:1, 9:4, 9:6, 9:10, 9:11 and 9:12 of the Dutch General Administrative Law Act; sections 3, 5, 7, 8 and 9 of the Municipality of Heerlen Complaints Ordinance 2024.