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December 23, 2021

Senator Warren Limmer, Chair  
Legislative Coordinating Commission Subcommittee on Data Practices  
3221 Minnesota Senate Building  
95 University Ave. W.  
St Paul, MN 55115

Representative John Lesch, Vice Chair  
Legislative Coordinating Commission Subcommittee on Data Practices  
563 State Office Building  
100 Rev. Dr. Martin Luther King, Jr. Blvd.  
St. Paul, MN 55155

Sally Olson, Commission Administrator  
Legislative Coordinating Commission Subcommittee on Data Practices  
72 State Office Building  
100 Rev. Dr. Martin Luther King, Jr. Blvd.  
St. Paul, MN 55155

Enclosed please find the Biennial Body Worn Camera (BWC) Audit Report, for the period August 19, 2021, to October 6, 2021; and the Automated License Plate Reader (ALPR) Audit Report, for the period August 16, 2021, to October 8, 2021.

Sincerely,

A handwritten signature in black ink that reads "Peggy Menshek".

Peggy Menshek  
City Clerk's Office

cc: Legislative Reference Library, [refdesk@lrl.leg.mn](mailto:refdesk@lrl.leg.mn)  
Ryan Patrick, Director of Minneapolis Internal Audit

Enclosures: Certificate of Audit Summary Report by Governing Body  
Portable Recording Systems Audit  
Automated License Plate Reader Audit

# CERTIFICATE OF AUDIT SUMMARY REPORT

## BY GOVERNING BODY

(Pursuant to Minnesota Statute 13.825, subd. 9)

### STATE OF MINNESOTA

County of Hennepin

### TO THE LEGISLATIVE COORDINATING COMMISSION SUBCOMMITTEE ON DATA PRACTICES (FORMERLY LEGISLATIVE COMMISSION ON DATA PRACTICES AND PERSONAL DATA PRIVACY):

PLEASE TAKE NOTICE, That the undersigned chief clerical officer of the City of Minneapolis DOES HEREBY CERTIFY, that in compliance with the provisions of Minnesota Statute 13.825, portable recording systems, Wildcard Corporation conducted an audit of the Minneapolis Police Department's Body Worn Camera/Automated License Plate Reader system to ensure compliance with state laws in accordance with Minnesota Statute 13.825, and was presented to the City Audit Committee on December 6, 2021, and published on December 6, 2021. The scope of the audit covers August 16, 2021, to October 8, 2021.

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A copy of the Biennial Audit of the Minneapolis Police Department Body Worn Camera/Automated License Plate Reader system Audit Summary Reports are hereto annexed and made a part of this certificate by reference.



Signed: \_\_\_\_\_

Casey Joe Carl, City Clerk  
City of Minneapolis  
(Official designation of officer)

# The City of Minneapolis

## Automated License Plate Reader Audit

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### Abstract

This document has been drafted to provide a Automated License Plate Reader Audit to the City of Minneapolis.



Point of Contact: Wildcard Corp. Cybersecurity Team [security@wildcardcorp.com](mailto:security@wildcardcorp.com)

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**Assessment Team**  
Justin Moravec, Director of Cybersecurity  
Dani Cronic, Lead Cybersecurity Analyst  
Derek Rodriguez, Cybersecurity Analyst

**Report Date:** 11 October 2021  
**Assessment Start Date:** 16 August 2021  
**Assessment End Date:** 8 October 2021

## Executive Summary

Wildcard was contracted by the City of Minneapolis to conduct an audit of the policies and procedures regarding Automated License Plate Readers (ALPR) in accordance with MN State Statute 13.824 Subd. 6 and all other related sections and subdivisions. In our evaluation, we have determined the City of Minneapolis to be in compliance.

Additionally, we recommend that the City of Minneapolis evaluates their capability to update any out-of-date ALPR software/firmware in order to improve the security posture of the ALPR infrastructure.

## Scope

The scope of this audit is defined in MN State Statute 13.824 Subd. 6 and all referenced subdivisions and sections.

# Findings and Recommendations

## Findings and Recommendations

### Time Skew

The subdivision in scope requires compliance with MN State Statute 13.824 Subd. 7, and this subdivision requires compliance with MN State Statute 13.05 Subd. 5. Here it is stated that "**The responsible authority shall establish procedures to assure that all data on individuals is accurate, complete, and current for the purposes for which it was collected...**".

It was mentioned during an interview that times recorded by ALPRs are not always accurate (**Item 1**). In order to be compliant with the necessary legislation, the City of Minneapolis must have a procedure in place to ensure the dates and times of ALPR data are accurate. However, it was stated during the interview that the MPD has a procedure for adjusting for the time-of-day inaccuracies.

In order to reduce the risk of problems due to inaccurate times, we recommend that the IT administrators in charge of the ALPR infrastructure review the device software/firmware configurations (and other necessary information) in order to derive potential solutions. They then should evaluate the capability of the City of Minneapolis to implement a given solution.

### Software Version

It was mentioned during an interview that the 3M software suite has likely not been updated in a long time (**Item 2**). In order to mitigate the risk of damage or breach of this system, we recommend that the IT administrators in charge of the ALPR infrastructure evaluate the capability of the City of Minneapolis to update the PAGIS and BOSS systems.

# Appendix A

## Appendix A.

### Item 1

**Interviewee:** "... actually, we learned this not too long ago, that the time is not current time... the time, and it depends on each different camera, might be off anywhere from a couple of minutes to a few hours... the time is not accurate..."

**Interviewer:** "... in a given situation, you'd be able to see how it's offset and correct it?"

**Interviewee:** "Yeah, and we've done that... We've been able to figure that out."

### Item 2

**Interviewee:** "From [what] my understanding is, the 3M system that we have has had zero updates and no planned updates."