

# INDEPENDENT AUDIT REPORT

Kris Markeson  
Chief of Police  
Waseca Police Department  
303 State Street So.  
Waseca, MN 56093

Dear Chief Markeson:

An independent audit of Waseca Police Department's Automated License Plate Reader (ALPR) System was conducted on October 8, 2025. The objective of the audit was to verify Waseca Police Department's compliance with Minnesota Statute §§13.824.

Data elements of the audit include:

## Minnesota Statute §13.824

- Data Collection; Classification; Use Restrictions
- Destruction of Data Required
- Sharing Among Law Enforcement Agencies
- Log of Use Required
- Biennial Audit
- Authorization to Access Data
- Notification to Bureau of Criminal Apprehension

Waseca Police Department is located in Waseca County and is authorized for twenty (20) peace officers. Waseca Police Department utilizes Axon squad ALPRs. Axon squad ALPR data is stored/managed in Evidence.com. ALPRs were implemented February 15, 2024. The audit covers the period February 15, 2024, through September 30, 2025.

## **Audit Requirement: Data Collection; Classification; Use Restrictions**

***Data Collection:*** Determine if data collected by the ALPR is limited to license plate numbers; date, time, and location data on vehicles; and pictures of license plates, vehicles, and areas surrounding the vehicles.

A review of ALPR data stored in Evidence.com confirmed that ALPR Data collected by Waseca Police Department is limited to license plate numbers; date, time, location of the stationary ALPR camera; and pictures of license plates, vehicles, and areas surrounding the vehicles.

***Classification:*** Determine if the data collected by ALPRs are appropriately classified.

Waseca Police Department ALPR data is presumptively private. All data collected by Waseca Police Department during the audit period is classified as private data.

***Use Restrictions:*** Determine if data collected by an ALPR is only matched with data in the Minnesota license plate data file and that data is not stored in a central state repository of ALPR

*data and that ALPR's are not used to monitor or track an individual who is the subject of an active criminal investigation unless authorized by a warrant, issued upon probable cause, or exigent circumstances justify the use without obtaining a warrant.*

Waseca Police Department ALPR data is matched only with data in the Minnesota License Plate Data File. ALPR data is not stored in a central state repository of ALPR data.

In accordance with policy and Minnesota Statute 13.824, Waseca Police Department does not monitor or track individuals who are the subject of an active criminal investigation using ALPR, nor have they applied for a warrant to do so. The Waseca Police Department has not under exigent circumstances used ALPR data to monitor or track individuals who are the subject of an active criminal investigation.

*No discrepancies noted.*

#### **Audit Requirement: Destruction of Data Required**

*Determine if the data collected by ALPR's are appropriately destroyed in accordance with statutes.*

Waseca Police Department's ALPR data has a retention period of sixty (60) days from the date of collection. Data is systematically deleted upon reaching the retention period. A query in Evidence.com confirmed that no data older than sixty (60) days was retained.

Waseca Police Department received neither requests from individuals who are the subject of a pending criminal charge or complaint to preserve ALPR data until the criminal charge or complaint is resolved or dismissed nor requests from program participants under chapter 5B to have ALPR data destroyed at the time of collection or upon receipt of the request.

*No discrepancies noted.*

#### **Audit Requirement: Sharing Among Law Enforcement Agencies**

*Determine if the sharing of ALPR data with other law enforcement agencies is in accordance with statutes.*

Waseca Police Department's ALPR policy governs the sharing of ALPR data among law enforcement agencies. ALPR data may be shared only for official law enforcement purposes or as otherwise permitted by law.

During the audit period, a vehicle photograph collected by ALPR and connected to a drug task force active investigation was shared with the drug task force. Law enforcement agencies seeking access to ALPR data are required to submit a written request documenting the factual basis and case file number, complaint or incident that is the basis for access. The Administrative Captain or an authorized designee reviews and approves requests for ALPR data.

The Waseca Police Department does not share with, disseminate to, sell to, or trade ALPR data with any other individual or entity.

*No discrepancies noted.*

#### **Audit Requirement: Log of Use Required**

*Determine if the agency maintains a public log of ALPR use in accordance with statute.*

Waseca Police Department's public log of ALPR use consists of system generated reports summarizing data collected from ALPRs. A review of the reports verified that the data includes:

- The date and time the ALPR actively collected data;
- The aggregate number of vehicles or license plates on which data was collected for each period of active use;
- The Minnesota License Plate Data File Hot List database the license plates were compared to;
- The number of hits/alarms for vehicles or license plates where the data identify a vehicle or license plate that has been stolen, a warrant for the arrest of the owner of a vehicle or an owner with a suspended or revoked driver's license or similar category or are active investigative data.

The Waseca Police Department has no stationary or fixed location ALPRs.

*No discrepancies noted.*

#### **Audit Requirement: Biennial Audit**

*Determine if the agency maintains records showing the date and time automated license plate reader data were collected and the applicable classification of the data, how the data are used, and whether data are destroyed as required.*

Waseca Police Department maintains records in Evidence.com showing the date and time automated license plate reader data were collected. All data collected during the audit period is classified as private or nonpublic data. Access to ALPR data is captured in the User Audit Report. Sharing of data through Evidence.com is captured in the audit trail. A vehicle photograph captured by ALPR was shared with the drug task force. All ALPR data was destroyed sixty (60) days after its collection.

*No discrepancies noted.*

#### **Audit Requirement: Authorization to Access Data**

*Determine if the law enforcement agency complies with statutes governing the operation of and*

*access to ALPR software and data.*

Waseca Police Department's ALPR policy governs the operation of and access to ALPR data. No member may operate or access ALPR data without first completing department approved training.

Nonpublic ALPR data is only available to persons whose work assignment reasonably requires access to the data. Members approved to access ALPR data may access it for legitimate law enforcement purposes only and when data relate to a specific criminal investigation or department-related civil or administrative action. Access to ALPR data is captured in the User Audit Report.

Access to ALPR data is managed by the assignment of roles and permissions in Evidence.com. Administration of Axon/Evidence.com is managed by a Captain.

The ALPR policy states that any member who violates Minn. Stat. § 13.09 through the unauthorized acquisition or use of ALPR data will face discipline and possible criminal prosecution.

Waseca Police Department has had no security breaches. A BCA CJIS Security Audit was conducted in August of 2023.

*No discrepancies noted.*

#### **Audit Requirement: Notification to Bureau of Criminal Apprehension**

*Determine if the agency notified the Bureau of Criminal Apprehension of its ALPR program.*

The Waseca Police Department notified the Bureau of Criminal Apprehension (BCA) of its ALPR use as required by statute. Waseca Police Department has no fixed or stationary ALPRs.

Waseca Police Department has not integrated the ALPR technology into another surveillance device.

*No discrepancies noted.*

This report was prepared exclusively for the City of Waseca and Waseca Police Department by Lynn Lembcke Consulting. The findings in this report are impartial and based on Waseca Police Department ALPR policy and information and documentation provided by Waseca Police Department and examined by Lynn Lembcke.

Dated: November 13, 2025

Lynn Lembcke Consulting



Lynn Lembcke