

INDEPENDENT AUDIT REPORT

Erika Scheider
Chief of Police
Roseville Police Department
2660 Civic Center Dr.
Roseville, MN 55113

Dear Chief Scheider:

An independent audit of Roseville Police Department's Automated License Plate Reader (ALPR) System was conducted on December 18, 2025. The objective of the audit was to verify Roseville 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

Roseville Police Department is located in Ramsey County, Minnesota and is authorized for sixty (60) peace officers. Roseville Police Department utilizes Flock License Plate Readers (ALPRs) in stationary or fixed locations. ALPR Data is managed in Flock Analytics software and is stored in the Amazon Web Services cloud. The audit covers the time period October 20, 2023 through December 15, 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 data stored in Flock confirmed that ALPR Data collected by Roseville 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.*

Roseville Police Department ALPR data is presumptively private. All data collected by Roseville Police Department during the audit period is classified as private data. Roseville Police Department had no instances of ALPR data with a public data classification.

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.*

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

Roseville Police Department's ALPR policy states that ALPRs shall not be used to monitor or track an individual unless done so under a search warrant or because of exigent circumstances.

No discrepancies noted.

Audit Requirement: Destruction of Data Required

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

Roseville Police Department's ALPR data has a retention period of thirty (30) days from the date of collection. Data is systematically deleted upon reaching the retention period. A query of data stored in Flock Analytics confirmed that no data older than thirty (30) days was maintained.

Roseville Police Department received no 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 have they received 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.

Roseville Police Department's ALPR policy governs sharing of ALPR data among law enforcement agencies. ALPR data may be shared only with other law enforcement or

prosecutorial agencies for official law enforcement purposes or as otherwise permitted by law.

During the audit period, Roseville Police Department received no requests to share ALPR data with another law enforcement agency. Law enforcement agencies seeking access to ALPR data would be required to submit a written request documenting the factual basis and case file number, complaint or incident that is the basis for access.

Roseville 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.

Roseville Police Department's public log of ALPR use consists of system generated reports that summarize the data collected by ALPRs. Reports include only data within the thirty (30) day retention period. 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.

Roseville Police Department maintains a list of the fixed locations of 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.

Roseville Police Department maintains records in Flock showing the date and time automated license plate reader data were collected. All data collected during the audit period is classified as private data or nonpublic data. When ALPR data are used in a criminal investigation, officers are required to enter the case file number and reason for

the use within Flock. No ALPR data had been shared with another law enforcement agency. All ALPR data was destroyed thirty (30) 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.

Roseville Police Department's ALPR policy governs the operation 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 audit trail.

Administration of Flock is managed by a detective. Access is managed by the assignment of roles and permissions in Flock. Flock maintains an audit trail of active ALPR data and captures all actions taken on ALPR data including access.

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.

Roseville Police Department has had no security breaches, and a BCA CJIS Security Audit was conducted in September of 2025.

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.

Roseville Police Department's ALPR system was implemented in October of 2023. Notification was made to BCA of their ALPR use and the location of fixed or stationary ALPRs within ten (10) days as required by statute. Roseville Police Department and the fixed or stationary ALPR locations appear on the Minnesota Department of Public Safety website.

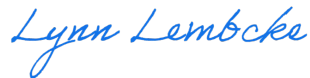
Roseville Police Department has not integrated the ALPR technology into another surveillance device.

No discrepancies noted.

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

Dated: January 29, 2026

Lynn Lembcke Consulting



Lynn Lembcke