

INDEPENDENT AUDIT REPORT

Todd Schwieger
Chief of Police
St. Francis Police Department
4058 St. Francis Blvd. NW
St. Francis, MN 55070

Dear Chief Schwieger:

An independent audit of St. Francis Police Department's Automated License Plate Reader (ALPR) System was conducted on December 11, 2025. The objective of the audit was to verify St. Francis 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

St. Francis Police Department is located in Anoka County and is authorized for twelve (12) peace officers. St. Francis Police Department utilizes Axon squad ALPRs. Axon squad ALPR data is stored/managed in Evidence.com. ALPRs were implemented July 3, 2025. The audit covers the period July 3, 2025, through November 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 St. Francis 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.

St. Francis Police Department ALPR data is presumptively private. All data collected by St. Francis 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.

St. Francis 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.

St. Francis 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. St. Francis Police Department has not used ALPRs to monitor or track individuals.

No discrepancies noted.

Audit Requirement: Destruction of Data Required

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

St. Francis 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 in Evidence.com confirmed that no data older than thirty (30) days was retained.

St. Francis 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.

St. Francis Police Department's ALPR policy governs the sharing of ALPR data among law enforcement agencies. ALPR data may be shared with other law enforcement or prosecutorial agencies for official law enforcement purposes or as otherwise permitted by law.

During the audit period, St. Francis Police Department did not 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.

The St. Francis 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

St. Francis 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 St. Francis 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.

St. Francis 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. 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.

St. Francis Police Department's ALPR policy governs the operation of and access to ALPR data. The ALPR policy states that ALPR shall only be used for official law enforcement business. 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 managed by the assignment of roles and permissions in Evidence.com. Administration of Axon/Evidence.com is managed by the Chief of Police. Access to ALPR data is captured in the User Audit Report.

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.

St. Francis Police Department has had no security breaches. A BCA CJIS Security Audit was conducted in March of 2025.

No discrepancies noted.

Audit Requirement: Notification to Bureau of Criminal Apprehension

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

The St. Francis Police Department notified the Bureau of Criminal Apprehension (BCA) of its ALPR use as required by statute. St. Francis Police Department appears on the Minnesota Department of Public Safety list of agencies using ALPRs. St. Francis Police Department has no fixed or stationary ALPRs.

St. Francis Police Department has not integrated the ALPR technology into another

surveillance device.

No discrepancies noted.

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

Dated: January 29, 2026

Lynn Lembcke Consulting

Lynn Lembcke

Lynn Lembcke