

INDEPENDENT AUDIT REPORT

Chief Ben Zender
Mounds View Police Department
2401 Mounds View Blvd.
Mounds View, MN 55112

Dear Chief Zender:

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

Mounds View Police Department is located in Ramsey County, Minnesota and authorized for twenty-one (21) peace officers. Mounds View Police Department utilizes ten (10) 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 April 4, 2024 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 data stored in Flock confirmed that ALPR Data collected by Mounds View 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.*

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

Mounds View 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.

Mounds View 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.

In accordance with policy and Minnesota Statute 13.824, Mounds View Police Department has not monitored or tracked individuals who are the subject of active criminal investigation using ALPR, nor have they applied for a warrant to do so. Mounds View Police Department has not monitored or tracked individuals who are the subject of an active criminal investigation under exigent circumstances without a warrant using ALPR.

No discrepancies noted.

Audit Requirement: Destruction of Data Required

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

Mounds View 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.

Mounds View Police Department had 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.

Mounds View Police Department's ALPR policy governs sharing of ALPR data among law enforcement agencies.

During the audit period, Mounds View Police Department had received requests to share ALPR data with other law enforcement agencies. Law enforcement agencies seeking access to ALPR data are required to submit a written request. Requests are documented within Flock.

Mounds View 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.

Mounds View 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. Reports are retained in accordance with the agency's Records Retention Schedule. 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.

Mounds View Police Department maintains a list of the ALPR fixed locations.

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.

Mounds View 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 searched for a criminal investigation, officers are required to enter the case file number and reason for the use within Flock. 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.

Mounds View 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 are permitted to access the data when there is an articulable suspicion that the data relates to a specific criminal investigation. Access to ALPR data is captured in the Flock audit trail.

Administration of Flock is managed by the Deputy Chief. 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.

Mounds View Police Department has had no security breaches. A BCA CJIS Security Audit was conducted in August of 2022.

No discrepancies noted.

Audit Requirement: Notification to Bureau of Criminal Apprehension

Determine if the agency notified the Bureau of Criminal Apprehension of its ALPR installation or use and of any fixed location of stationary ALPRs.

Mounds View Police Department's ALPR system was implemented in April of 2024. A review of the Minnesota Department of Public Safety website and the State of Minnesota Interconnection Security Agreement confirms that Mounds View Police Department notified the BCA of their ALPR use. The location of fixed or stationary ALPRs appears on the BCA Minnesota Department of Public Safety website.

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

No discrepancies noted.

This report was prepared exclusively for the City of Mounds View and Mounds View Police Department by Lynn Lembcke Consulting. The findings in this report are impartial and based on

Mounds View Police Department ALPR policy and information and documentation provided by Mounds View Police Department and examined by Lynn Lembcke.

Dated: February 24, 2026

Lynn Lembcke Consulting



Lynn Lembcke