

# INDEPENDENT AUDIT REPORT

Chief Tim Hoyt  
New Hope Police Department  
4401 Xylon Ave. N.  
New Hope, MN 55428

Dear Chief Hoyt:

An independent audit of New Hope Police Department's Automated License Plate Reader (ALPR) System was conducted on April 16, 2026. The objective of the audit was to verify New Hope 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

New Hope Police Department is located in Hennepin County, Minnesota and is authorized for thirty-four (34) peace officers. New Hope 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 June 3, 2024 through March 31, 2026.

## **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 New Hope 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.*

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

New Hope 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, New Hope Police Department does not monitor or track individuals who are the subject of an active criminal investigation using ALPRS, nor have they applied for a warrant to do so. New Hope 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.*

New Hope 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.

New Hope 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 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.*

New Hope Police Department's ALPR policy governs sharing of ALPR data among law enforcement agencies.

During the audit period, New Hope Police Department received no requests to share ALPR data not related to a criminal investigation with another law enforcement agency. Law enforcement agencies seeking ALPR data not related to a criminal investigation 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 request would be documented in the records management system dissemination log and a data request tracker.

New Hope 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.*

New Hope Police Department's public log of ALPR use consists of system generated reports that summarize the data collected by ALPRs. Reports include 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.

New Hope 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.*

New Hope Police Department maintains records in Flock and the public log 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 not related to a criminal investigation had been shared with another law enforcement agency. 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.*

New Hope 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, such as when data relate to a specific criminal investigation or department-related civil or administrative action. Access to ALPR data is captured in the Flock audit trail.

Access to Flock 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. Administration of Flock 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.

New Hope Police Department has had no security breaches, and a BCA CJIS Security Audit was conducted in March 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.*

New Hope Police Department's ALPR system was implemented in June of 2024. A review of the Minnesota Department of Public Safety website confirms that New Hope

Police Department notified the BCA of their ALPR use and the location of fixed or stationary ALPRs as required by statute.


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

*No discrepancies noted.*

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

Dated: May 6, 2026

Lynn Lembcke Consulting



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Lynn Lembcke