

INDEPENDENT AUDIT REPORT

Chief Terry Stier
Belle Plaine Police Department
420 E. Main St.
Belle Plaine, MN 56011

Dear Chief Stier:

An independent audit of Belle Plaine Police Department's Automated License Plate Reader (ALPR) System was conducted on April 28, 2026. The objective of the audit was to verify Belle Plaine 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

Belle Plaine Police Department is located in Scott County, Minnesota and is authorized for thirteen (13) peace officers. Belle Plaine Police Department utilizes Flock License Plate Readers (ALPR) in five (5) 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 January 2, 2024 through April 15, 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 Analytics confirmed that ALPR Data collected by Belle Plaine 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.*

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

Belle Plaine 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.

Belle Plaine 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, Belle Plaine 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. Belle Plaine Police Department has not under exigent circumstances used ALPR data to monitor or track individuals who are the subject of active criminal investigations.

The Belle Plaine Police Department 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.

Belle Plaine 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.

Belle Plaine 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.

Belle Plaine Police Department's ALPR policy governs 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 as permitted by law.

During the audit period, Belle Plaine Police Department received requests to share ALPR data with other law enforcement agencies. Law enforcement agencies seeking ALPR data not related to an active criminal investigation are required to submit a written request documenting the factual basis and case file number, complaint or incident that is the basis for access. Sharing of data is documented by the creation of an ICR.

Belle Plaine 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.

Belle Plaine 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.

Belle Plaine Police Department maintains a list of the fixed locations of ALPRs. None of the locations are considered security information.

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.

Belle Plaine 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. ALPR data has been shared with other law enforcement agencies. 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.

Belle Plaine 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 online Flock 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 Flock audit trail.

Administration of Flock is managed by the Administrative Sergeant. 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.

Belle Plaine Police Department has had no security breaches. A BCA CJIS Security Audit was conducted in July of 2024.

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.

Belle Plaine Police Department's ALPR system was implemented in January 2, 2024. A review of the Minnesota Department of Public Safety website confirms that Belle Plaine Police Department notified the BCA of their ALPR use and the location of the five (5) fixed or stationary ALPRs as required by statute.

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

No discrepancies noted.

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

Dated: June 15, 2026

Lynn Lembcke Consulting

Lynn Lembcke

Lynn Lembcke