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White Bear Lake Police Department 2026 Motorola ALPR (Closeout Audit)

Executive Summary

Prepared for White Bear Lake Police Department

October 28, 2026



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Background:

The White Bear Lake Police Department retained Minnesota Security Consortium to audit its agency's use of their embedded Motorola ALPR System against the requirements of MN Statute 13.824. The Minnesota Security Consortium does not operate or have access to their ALPR systems, therefore allowing it to audit the systems as an independent auditor. The White Bear Lake Police Department had their Motorola ALPR system operational between 10/26/24 to 7/29/26. They had 7 Motorola mobile squad units and no stationary Motorola units, at the time of this audit. This is their first Motorola ALPR Audit.

Department Policy & Procedures:

White Bear Lake Police Department has an ALPR Policy in place entitled, "Policy 423: Automated License Plate Readers (ALPR)." They have been keeping their policy updated and have recently reviewed it. This policy is readily available to the public online at:

<https://www.whitebearlakemn.gov/publicsafety/page/policy-manual>

A review of this policy found that the White Bear Lake Police Department was compliant in this part of the statute.

Record Retention:

The White Bear Lake Police Department's Motorola ALPR administrative control panel was audited to ensure that each setting was configured for a retention period of no more than 60 days. The department has set a 60-day plate data retention period, which was verified in the control panel during the audit.

White Bear Lake Police Department was found to be compliant with this part of the statute.

Data Security and Access Control:

The White Bear Lake Police Department's ALPR system is protected by an Access Control system built into the Motorola backend server application. Members of the White Bear Lake Police Department must undergo department-approved training prior to being permitted to use the ALPR System. User accounts and role-based accounts are reviewed on a regular basis by ALPR Administrators. A review of all users and their assigned roles was conducted as part of this audit. Roles and access were consistent for each user's job description, and a review of all users showed that users were being de-activated when no longer with the agency or using the system. The White Bear Lake Police Department was found to be compliant in this part of the statute.

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Data Classification:

White Bear Lake Police Department ALPR data that has been collected is classified as private unless access is permitted by law. This classification is also clarified in Policy 801: Records Maintenance and Release, Section 801.5 Release Restriction, subsection (k):

“All data collected by an Automated License Plate Reader (ALPR) on individuals or nonpublic data absent an exception (Minn. Stat. § 13.82; Minn. Stat. § 13.824).”

Data requests for data collected on a license plate owner's vehicle are readily available through a proper records request via the White Bear Lake Police Department. Citizens can make the data request via their website:

<https://www.whitebearlakemn.gov/268/RecordsReport-Request>

White Bear Lake Police Department was found to be compliant with this part of the statute.

Sharing Among Law Enforcement Agencies:

Appropriate sharing of ALPR data is conducted through inter-agency requests. The searches are documented in the Motorola system by officer and justification. A sample of the whole month of July 2028 was reviewed as part of the audit, and all searches had a justifiable reason for the ALPR data share to the requesting officer. As a result of these findings, White Bear Lake Police Department was found to be compliant with this part of the statute.

Public Log of Use:

The Motorola ALPR system also contains a robust audit trail which can produce Public Log of Use reports as required by 13.824 Subd. 5. Sampled reports were reviewed during the audit process but stopped after the program was terminated. These public logs of use are readily available through a proper records request through the White Bear Lake Police Department. White Bear Lake Police Department was found to be compliant with this part of the statute.

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Notification to Bureau of Criminal Apprehension:

White Bear Lake Police Department had made the required notification to the Bureau of Criminal Apprehension. This was validated on the BCA website at the time of the audit, and since then they have requested that their listing be removed. White Bear Lake Police Department was found to be compliant with this part of the statute.

Biennial Public Accountability Audit:

White Bear Lake Police Department activated their Motorola ALPR system in 2024. This is their first ALPR Audit of the Motorola system and is also a close-out audit since they stopped using the ALPR feature in July 2026. Command Staff were very cooperative throughout the entire audit process and understood the intent of the public accountability and provided easy access to policies and procedures, staff interviews, and audit of their ALPR Reports. White Bear Lake Police Department was found to be compliant with this part of the statute.

Breach Notification:

The White Bear Lake Police Department's ALPR Policy entitled, "Policy 423: Automated License Plate Readers (ALPR)," section 423.6 Accountability, subd (d) states, "Breaches of personal data are addressed as set forth in the Protected Information Policy (Minn. Stat. § 13.055)." Minn. Stat. § 13.055 includes procedures for Breach Notification and should satisfy Minn. Stat. § 13.824. White Bear Lake Police Department was found to be compliant with this part of the statute.

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Conclusion:

Based on the results of the White Bear Lake Police Department ALPR Audit conducted by Minnesota Security Consortium, we can demonstrate that they were using the ALPR System as an effective law enforcement tool for the purpose of combating auto theft and other crimes linked to vehicle license plates. The White Bear Lake Police Department also demonstrated that their security, public accountability, and administration of the program followed MN Statue 13.824.

This Audit was conducted and attested to by:

Dimitrios Hilton

Senior Auditor, Minnesota Security Consortium.

Submitted to:

- White Bear Lake Chief of Police
- Minnesota Commissioner of Administration
- Legislative Commission on Data Practices and Personal Data Privacy
- Required Chairs of Legislative Committees
- Minnesota Legislative Library