INDEPENDENT AUDIT REPORT

Chief William Duggan
Prior Lake Police Department
4649 Dakota St. SE
Prior Lake, MN 55372

Dear Chief Duggan:

An independent audit of Prior Lake Police Department's Automated License Plate Reader (ALPR) System was conducted on September 2, 2026. The objective of the audit was to verify Prior Lake 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

Prior Lake Police Department is located in Scott County, Minnesota and authorized for thirty-seven (37) peace officers. Prior Lake Police Department utilizes Flock ALPRs in six (6) permanent locations and fifteen (15) Axon squad ALPRs. Flock data is stored/managed in Flock Analytics, and Axon squad ALPR data is stored/managed in Evidence.com.

Flock ALPRs were implemented in September, 2025, and Axon squad ALPRs were implemented in September, 2024. This audit covers the time period September 1, 2024, through August 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 Analytics and Evidence.com confirmed that ALPR Data collected by Prior Lake 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.*

Prior Lake Police Department ALPR data is presumptively private. All data collected by Prior Lake 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.*

Prior Lake 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.

The Prior Lake 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.

In accordance with Minnesota Statute 13.824 and policy, three (3) warrants were obtained by the Prior Lake Police Department to use ALPRs to monitor or track individuals who were the subject of active criminal investigations.

The Prior Lake 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.

Prior Lake Police Department's Flock and Axon squad ALPR data have retention periods of thirty (30) days from the date of collection. Data is systematically deleted upon reaching the retention period. Queries in Flock Analytics and Evidence.com confirmed that no ALPR data older than thirty (30) days was maintained.

Prior Lake Police Department received no 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. Prior Lake Police Department received no 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.

Prior Lake 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 as permitted by law and in accordance with policy.

During the audit period, Prior Lake Police Department had received no written requests to share ALPR data not related to a criminal investigation with another law enforcement agency. Law enforcement agencies seeking access to 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 Prior Lake 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.

Prior Lake Police Department's public log of ALPR use consists of system generated reports and the Prior Lake Flock Transparency Portal summarizing data collected from Flock for 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.

The Prior Lake Police Department maintains a list of the stationary/fixed ALPR 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.

Prior Lake Police Department maintains records in Flock Analytics and 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. 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 used in a criminal investigation is uploaded into Evidence.com. No requests to share ALPR data not related to a criminal investigation were received from 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.

Prior Lake Police Department's ALPR policy governs the operation of 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 official law enforcement business and shall not use, or allow others to use, the equipment or database records for unauthorized purposes. When Flock ALPR data are accessed, officers are required to enter the reason and case file number for the access. Access to ALPR data is captured in the audit trail.

Flock Analytics and Evidence.com are administered by a Commander. Access is managed by the assignment of roles and permissions in Flock Analytics and Evidence.com. Flock Analytics and Evidence.com maintain audit trails of actions taken on ALPR data.

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.

Prior Lake Police Department 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 if the agency notified the Bureau of Criminal Apprehension of its ALPR program within ten days of installation or current use of an automated license plate reader or integration of automated license plate reader technology into another surveillance device.

The Prior Lake Police Department submitted a LPR Agency Data Collection Form listing locations of stationary ALPRs to BCA as required by statute. Prior Lake Police Department appears on the BCA list of agencies using ALPRs. Prior Lake Police Department has not integrated ALPR technology into any other surveillance device.

No discrepancies noted.

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

Dated: October 25, 2026

Lynn Lembcke Consulting

Lynn Lembcke

Lynn Lembcke