THE AXTELL GROUP

October 30, 2026

Chief Daniel M. Wills
Rogers Police Department
21860 Industrial Court
Rogers, MN 55374

RE: Audit of Automated License Plate Reader (ALPR) Program

Chief Wills,

Pursuant to the professional services agreement between The Axtell Group and the Rogers Police Department, The Axtell Group has completed an independent audit of the department's automated license plate reader (ALPR) program under Minnesota Statutes section 13.824. The scope of the audit included determining whether ALPR data are appropriately classified, how the data are used, whether data are destroyed as required, and whether the program complies with subdivision 7 of section 13.824. The Axtell Group identified no exceptions during its audit of the Rogers Police Department's ALPR program.

The audit period ended September 30, 2026.

This audit focused on whether the Rogers Police Department (RPD) has implemented the policies, procedures, systems, and operational practices to appropriately classify, retain, secure, and destroy ALPR data in compliance with Minnesota Statutes §§ 13.824 and 626.8472. Our assessment reviewed the collection of ALPR data, whether retention and destruction protocols meet the statutory 60-day requirement under subdivision 3, and whether the program meets the specific obligations set forth under subdivisions 4 (sharing among agencies), 5 (log of use), 7 (authorization to access), and 8 (notification to the BCA) of section 13.824.

Legal and Operational Standards Assessed
The following statutory requirements and audit elements formed the basis of the review:

- Data collection, classification, and permissible uses
- Data destruction and retention protocols
- Interagency sharing restrictions
- Authorization to access data
- Biennial audit requirement
- Notification to the Bureau of Criminal Apprehension (BCA)

Background

The Rogers Police Department, located in Hennepin County, Minnesota, serves the community with a staff of dedicated law enforcement professionals. The department implemented its ALPR program in 2024 and expanded the program in 2025, utilizing Flock Safety cameras and Axon ALPR systems to support investigative and public safety objectives.

As of the date of this audit, the Rogers Police Department operates cameras for criminal investigations and alerts involving stolen vehicles, warrants, and missing persons. Data are managed through commercial public safety platforms. Authorized personnel may access ALPR data via department workstations, and data are retained in accordance with state law and department policy for law enforcement purposes. The Rogers Police Department reports its fixed or stationary ALPR locations to the Minnesota BCA and leverages a vendor-hosted public transparency portal. The department may wish to consult with its city attorney regarding ongoing in-service training on ALPR operations and state requirements.

We appreciate the cooperation of the Rogers Police Department throughout this process and commend the department's efforts to maintain transparency and accountability in its use of ALPR technology. Should you have any questions about the findings or wish to discuss the results further, please do not hesitate to contact me directly.

Todd Axtell



President and CEO
The Axtell Group

Submitted to:
Daniel M. Wills, Chief of Police
Legislative Reference Library

Audit Summary

Description	Statute	Result
ALPR data collection is limited to license plate numbers; vehicle date, time, and location data; and pictures of license plates, vehicles, and surrounding areas.	§ 13.824, subd. 2(a)	No exceptions found
ALPR data are classified as private or nonpublic unless public or active criminal investigative data under the specified provisions of § 13.82.	§ 13.824, subd. 2(b)	No exceptions found
ALPR data are matched only against the Minnesota license plate data file unless additional matching data relate to an active criminal investigation.	§ 13.824, subd. 2(c)	No exceptions found
ALPRs are not used to monitor or track an individual who is the subject of an active criminal investigation without a warrant issued upon probable cause or exigent circumstances.	§ 13.824, subd. 2(d)	No exceptions found
Traffic safety camera systems are not used for ALPR purposes.	§ 13.824, subd. 2a	No exceptions found
Unless a statutory exception applies, ALPR data unrelated to an active criminal investigation are destroyed no later than 60 days after collection.	§ 13.824, subd. 3(a)	No exceptions found
Upon a written request from an individual facing a pending criminal charge or complaint, potentially exculpatory ALPR data are preserved until the charge or complaint is resolved or dismissed.	§ 13.824, subd. 3(b)	No exceptions found
Upon written request from a Chapter 5B program participant, related ALPR data are destroyed at collection or receipt of the request, whichever is later, unless the data constitute active criminal investigative data. The existence of the request is private.	§ 13.824, subd. 3(c)	No exceptions found
Inactive criminal investigative ALPR data are destroyed according to the applicable records retention schedule.	§ 13.824, subd. 3(d); § 138.17	No exceptions found
Only authorized personnel have access to ALPR data.	§ 13.824, subd. 7(b)	No exceptions found

Description	Statute	Result
Access serves a legitimate, specified, and documented law enforcement purpose.	§ 13.824, subd. 7(b)	No exceptions found
A data audit trail records all queries and responses and all actions involving entry, updating, access, sharing, or dissemination of ALPR data.	§ 13.824, subd. 7(c)	No exceptions found
A public use log records the specific times of day during which ALPRs actively collect data.	§ 13.824, subd. 5(a)(1)	No exceptions found
A public log captures the number of vehicles or license plates on which data were collected and the databases to which the data were compared (unless the existence of the database is not public).	§ 13.824, subd. 5(a)(2)	No exceptions found
For each period of active use, the public log records counts by statutory category, including stolen vehicles or plates, owner arrest warrants, suspended or revoked licenses or similar categories, and active investigative data.	§ 13.824, subd. 5(a)(3)	No exceptions found
The public use log identifies the locations where stationary or fixed ALPRs are installed, used, and actively collect data.	§ 13.824, subd. 5(a)(4)	No exceptions found
The agency maintains current and previous fixed ALPR locations, including dates at those locations. The list is publicly accessible unless classified as security information.	§ 13.824, subd. 5(b)	No exceptions found
Records identify the date and time ALPR data were collected and the applicable data classification.	§ 13.824, subd. 6(a)	No exceptions found
Safeguards and written access procedures restrict ALPR data access to authorized personnel for authorized purposes.	§ 13.824, subd. 7(a)–(b)	No exceptions found
Administrative and technical safeguards protect ALPR systems and data against unauthorized access.	§ 13.824, subd. 7(a)–(b)	No exceptions found
The department has a written ALPR policy governing use, access, and retention.	§ 626.8472	No exceptions found

Description	Statute	Result
The ALPR policy incorporates employee disciplinary standards for unauthorized access to data.	§ 626.8472; § 13.09	No exceptions found
Sharing and disclosure of ALPR data unrelated to an active criminal investigation comply with statutory restrictions; receiving law enforcement agencies comply with classification, destruction, and security requirements.	§ 13.824, subd. 4(a)–(c), and subd. 7	No exceptions found
The agency arranges an independent biennial audit of ALPR records and statutory compliance.	§ 13.824, subd. 6(a)	No exceptions found
The agency notifies the BCA of the installation or use and of any fixed location of a stationary automated license plate reader.	§ 13.824, subd. 8	No exceptions found