INDEPENDENT AUDIT REPORT

Chief Nick Sather
Red Wing Police Department
430 W. 6th St.
Red Wing, MN 55066

Dear Chief Sather:

An independent audit of Red Wing Police Department's Automated License Plate Reader (ALPR) System was conducted on October 20, 2026. The objective of the audit was to verify Red Wing 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

Red Wing Police Department is located in Goodhue County, Minnesota and authorized for thirty-two (32) peace officers. Red Wing Police Department utilizes Axon squad ALPRs in ten (10) squad cars and Axon Outpost ALPRs in six (6) stationary locations. ALPR data is stored/managed in Evidence.com. Squad ALPRs were implemented December 4, 2025, and Axon Outpost ALPRs were implemented July 28, 2026. This audit covers the time period December 4, 2025, through October 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 ALPR data stored in Evidence.com confirmed that data collected by Red Wing 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.*

Red Wing Police Department ALPR data is presumptively private. All ALPR data collected by Red Wing 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.*

Red Wing 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.

In accordance with policy and Minnesota Statute § 13.824, Red Wing Police Department has not monitored or tracked individuals who are the subject of an active criminal investigation using ALPR.

The Red Wing Police Department has not under exigent circumstances used ALPR to monitor or track individuals who are the subject of an active criminal investigation.

The Red Wing 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.

Red Wing Police Department's ALPR data has a retention period of fourteen (14) days from the date of collection. Data is systematically deleted upon reaching the retention period. Queries in Evidence.com confirmed that no ALPR data older than fourteen (14) days was maintained.

Red Wing 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. Red Wing 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.

Red Wing 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, Red Wing Police Department received no 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 Red Wing 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.

Red Wing Police Department's public log of ALPR use consists of system generated reports summarizing data collected from ALPRs. 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 Red Wing 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.

> Red Wing Police Department maintains records in 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 searched for use in a criminal investigation, officers are required to enter the case file number and reason for the use in Evidence.com. No ALPR data not related to a criminal investigation had been shared with another law enforcement agency. All ALPR data was destroyed fourteen (14) 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.

> Red Wing 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 legitimate law enforcement purposes only and when data relate to a specific criminal investigation or department-related civil or administrative action. When 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.
>
> Access to ALPR data is managed by the assignment of roles and permissions in Evidence.com. Evidence.com maintains an audit trail of actions taken on ALPR data. Administration of Evidence.com is managed by the Deputy Chief.
>
> 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.
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> Red Wing Police Department had no security breaches. A BCA CJIS Security Audit was conducted in September 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.

> Red Wing Police Department submitted the LPR Agency Data Collection Form listing locations of stationary ALPRs to BCA as required by statute. Red Wing Police Department appears on the BCA list of agencies using ALPRs. Red Wing Police Department has not integrated ALPR technology into another surveillance device.

No discrepancies noted.

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

Dated: November 15, 2026

Lynn Lembcke Consulting

Lynn Lembcke

Lynn Lembcke