

INDEPENDENT AUDIT REPORT

John Sherwin
Chief of Police
Faribault Police Department
25 4th St. NW
Faribault, MN 55021

Dear Chief Sherwin:

An independent audit of Faribault Police Department's Automated License Plate Reader (ALPR) System was conducted on August 27, 2025. The objective of the audit was to verify Faribault 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

Faribault Police Department is located in Rice County, Minnesota and is authorized for thirty-five (35) peace officers.

Faribault Police Department utilizes Flock License Plate Readers (ALPRs) in five (5) permanent locations and Axon squad ALPRs. Flock ALPR data is stored/managed in Flock Analytics Amazon Web Services cloud. Axon squad ALPR data is stored/managed in Evidence.com. Faribault Police Department's Flock ALPR program was implemented on February 27, 2024, and Axon squad ALPRs were implemented on July 8, 2024. This audit covers the period February 27, 2024, through August 15, 2025.

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 Faribault Police Department is limited to license plate numbers; date, time, vehicle location; location of stationary ALPR cameras; and pictures of license plates, vehicles, and areas surrounding the vehicles.

Classification: Determine if the data collected by ALPRs are appropriately classified.

Faribault Police Department ALPR data is presumptively private. All ALPR data collected by Faribault 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.

Faribault 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, Faribault Police Department did not monitor or track individuals who are the subject of an active criminal investigation using ALPR without a warrant to do so.

The Faribault Police Department did not use ALPRs to monitor or track individuals under exigent circumstances without obtaining a warrant.

No discrepancies noted.

Audit Requirement: Destruction of Data Required

Determine if the data collected by ALPR's are appropriately destroyed in accordance with statutes.

Faribault Police Department's Flock ALPR data has a retention period of thirty (30) days, and Axon squad ALPR data has a retention period of sixty (60) days from the date of collection. Data is systematically deleted from Flock Analytics and Evidence.com upon reaching the retention period. Queries in Flock Analytics and Evidence.com confirmed that no data were retained for more than thirty (30) and sixty (60) days respectively.

Faribault 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 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 in accordance with statutes.

Faribault Police Department's ALPR policy governs the sharing of ALPR data among law enforcement agencies.

During the audit period, Faribault Police Department had received requests to share ALPR data with other law enforcement agencies. Law enforcement agencies seeking access to ALPR data are required to submit a written request documenting the factual basis and case file number, complaint or incident that is the basis for access. The written request is retained on file and an ICR documenting the sharing of data is created. Sharing of data is captured in the Flock and Evidence.com audit trails.

The ALPR policy requires Faribault Police Department to advise law enforcement agencies receiving access to ALPR data of statute requirements relating to ALPR data. Faribault Police Department advised law enforcement agencies receiving access to ALPR data of statute requirements in writing at the time the data was shared.

The Faribault 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.

Faribault Police Department's public log of ALPR use consists of Flock and Evidence.com system generated reports summarizing data collected from ALPRs. A review of the reports verified that the log 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 Faribault 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.

Faribault 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. The audit trails, the records management system, and ICRs document how ALPR data are used. ALPR data not converted to evidence for use in criminal investigations was destroyed from Flock Analytics in thirty (30) days and Evidence.com in sixty (60) 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.

Faribault 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 for the access within Flock and Evidence.com. Access to ALPR data is captured in the Flock and Evidence.com audit trails.

Access to ALPR data is managed by the assignment of roles and permissions in Flock and Evidence.com. Flock maintains an audit trail of active ALPR data and captures all actions taken on ALPR data. Evidence.com maintains audit trails of ALPR data within the User Audit Trails. Administration of Flock Analytics and Evidence.com is managed by a Captain and Sergeant.

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.

Faribault Police Department has had no security breaches, and a BCA CJIS Security Audit was conducted in June 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.

The Faribault Police Department notified the Bureau of Criminal Apprehension (BCA) of its ALPR program and submitted a BCA LPR Agency Data Collection Form as required by statute. Faribault Police Department is listed as an agency using ALPRs on the Minnesota Department of Public Safety website.

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

No discrepancies noted.

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

Dated: October 28, 2025

Lynn Lembcke Consulting



Lynn Lembcke