



# INDEPENDENT AUDITOR'S REPORT

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Grand Rapids Police Department



SEPTEMBER 25TH, 2025  
RAMPART AUDIT LLC

## **Automated License Plate Reader Audit Report**

Dear Chief Morgan:

We have audited the Grand Rapids Police Department's (GRPD) Automated License Plate Reader (ALPR) program for the two-year period ended 7/31/2025.

The purpose of this audit is to evaluate GRPD's compliance with Minn. Stat. §13.824, which sets forth requirements and prohibitions governing the use of ALPRs and the collection, use, management and destruction of ALPR data, and Minn. Stat. §626.8472, which mandates that the chief law enforcement officer (CLEO) of any agency that maintains an ALPR system in Minnesota establish and enforce a written policy governing the use of the system, and also sets forth minimum requirements for the ALPR system policy.

Minn. Stat. §13.824 Subd. 6 requires that an agency shall arrange for an independent, biennial audit of its ALPR records "to determine whether data currently in the records are classified, how they are used, whether they are destroyed as required... and to verify compliance with [Minn. Stat. §13.824] Subdivision 7," which governs authorization to access data. This program and its associated data are the responsibility of the Grand Rapids Police Department. Our responsibility is to express an opinion on the operations of this program based on our audit.<sup>1</sup>

On August 14, 2025, Rampart Audit, LLC (Rampart) met with Captains Jeremy Nelson and Kevin Ott, who provided information about GRPD's ALPR program and facilitated access to GRPD ALPR data by running reports and retrieving sample data at the direction of Rampart. Please note that all ALPR data access undertaken for the purpose of this audit occurred between the hours of 1:00 PM and 3:00 PM on 8/14/2025 and was logged in the ALPR system with a reason code of "ALPR audit." No direct system access was granted to the auditors, nor was any data downloaded by the auditors.

### **ALPR PROGRAM**

Captains Nelson and Ott advised us that GRPD's ALPR program began in March of 2023. As of the date of the audit, GRPD has deployed 16 mobile ALPRs and no stationary ALPRs.

Grand Rapids Police Department employs the Axon Fleet ALPR system, which utilizes optical character recognition (OCR) technology built into the existing in-car cameras installed in GRPD squads. The Axon

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<sup>1</sup> Rampart is aware of recent media reports indicating one or more ALPR vendors operating in the State of Illinois may have shared data without the knowledge or consent of the agency that collected the data. Any such issues are beyond the scope of this audit.

cameras compare each scanned license plate to two databases. The Minnesota License Plate Data file contains a limited version of the Minnesota DVS database, which includes a list of those vehicles registered to individuals whose driving status is identified as suspended, revoked, canceled or disqualified. This file also contains FBI Hot File data related to stolen and felony vehicles, wanted persons and attempts to locate. The Manual Hot List file contains a list of license plates related to active investigations which have not been entered in the Minnesota License Plate Data file. While these condensed databases may be updated multiple times per day, they are not considered “live” data.

The ALPR system integrates with the squad’s mobile data terminal (MDT), and is normally active whenever the camera is powered on. The ALPR software runs in the background and the vast majority of license plate reads require no action on the part of the officer. When the ALPR identifies a possible match to a license plate listed in one of the databases listed above, or “hit,” it triggers an audible alert and activates a window on the MDT to display information about the alert, including the nature of the hit and two images: a close-up of the license plate, and a wide-angle view that shows portions of the vehicle and the area immediately surrounding the vehicle. The screen will remain active until the officer provides a response to the hit.

In most instances, the officer is able to dismiss the hit alert without taking further action. Common reasons for hit dismissals include scans of parked vehicles indicating that the registered owner lacks a valid driving status, state mismatches and misread plate numbers. Officers will also dismiss alerts that result from scans that occur while responding to higher priority calls. When an alert is not dismissed, officers are required to confirm the hit information through the appropriate live database (DVS or NCIC) before taking enforcement action.

Data from ALPR scans, including hit data, upload wirelessly to Axon’s secure cloud storage service, Evidence.com. GRPD retains ALPR data for 30 days, after which it is permanently deleted. ALPR data is retained beyond 30 days only when classified as active investigatory data, or when so requested in writing by an individual who is the subject of a criminal investigation and who identifies the data as potential exculpatory evidence. Any ALPR data to be retained beyond 30 days is exported through a manual process to a separate Evidence.com database and is retained as evidence until manually purged.

The ALPR system was purchased with funds provided by the Aitkin Itasca Mille Lacs Violent Crimes Enforcement Team (AIM VCET). Grand Rapids Police Department is the first member agency to deploy ALPRs. Their experience will determine whether other member agencies also acquire ALPRs.

At the time of our audit, GRPD retained records of 166,648 ALPR reads and 1,331 hits during the preceding 30 days.

## **ALPR POLICY**

As noted above, Minn. Stat. §626.8472 states:

The chief law enforcement officer of every state and local law enforcement agency that maintains an automated license plate reader shall establish and enforce a written policy governing use of the reader. Use of an automated license plate reader without adoption of a

written policy under this section is prohibited. At a minimum, the policies and procedures must incorporate the requirements of section 13.824, and the employee discipline standards for unauthorized access to data contained in section 13.09.

Rampart reviewed a copy of Grand Rapids Police Department's ALPR policy and compared it to the requirements and prohibitions contained in Minn. Stat. §13.824. In our opinion, GRPD's ALPR policy addresses all of the mandatory elements identified in the statute, including the employee discipline standards for unauthorized access to ALPR data.

## **DATA COLLECTION**

Minn. Stat. §13.824 Subd. 2 limits ALPR data collection to the following elements:

1. License plate numbers;
2. Date, time and location data on vehicles; and
3. Pictures of license plates, vehicles and areas surrounding the vehicles.

Rampart selected a random sample of ten license plate hits from the 1,331 retained hits. We reviewed the sample data against the list of permitted data elements above. We did not note any exceptions.

Axon's ALPR system employs artificial intelligence (AI) to analyze the photos and develop what it terms Vehicle Attribute Recognition (VAR) data. This includes details such as the vehicle's make, model, body style and color, as well as the license plate's state of issuance. Each element is given a probability score, Axon's estimate as to the reliability of its analysis. This data is retained along with the §13.824 Subd. 2 data. We noted that these VAR elements are not "collected," but rather are the product of AI analysis that is applied to the photographs collected under Subd. 2. We also noted that the reliability of this data is uncertain, as the system expressed 99.99% confidence that one of the Minnesota license plates in our sample was in fact a North Dakota license plate.

The ALPR system also records the identity of the officer who is logged into the camera at the time of each read, as well as the response to each hit entered by the officer, such as "citation" if a citation is issued, or "dismissed" if no action is taken. We noted that these details are not data collected by the license plate reader itself, but rather could be deemed metadata – that is, additional data about the ALPR read or hit data that are necessary for auditing and classification purposes.

## **DATA CLASSIFICATION**

Minn. Stat. §13.824 Subd. 2(b) states:

All data collected by an automated license plate reader are private data on individuals or nonpublic data unless the data are public under section 13.82, subdivision 2, 3, or 6, or are active criminal investigative data under section 13.82, subdivision 7.

While GRPD's ALPR policy does not explicitly state this, the access requirements and controls documented in the policy are appropriate for private or nonpublic data.

Captain Nelson advised us that GRPD has not had any requests for ALPR data either from other law enforcement agencies, or from members of the public. As part of the audit, Rampart reviewed with GRPD personnel the procedures that would be employed in response to such requests. In our opinion, those procedures, as outlined in GRPD's ALPR manual, are consistent with the requirements included in Minn. Stat. §13.824 Subd. 2 for data sharing with other law enforcement agencies.

We reviewed the audit log report for the audit period, and did not identify any instances of ALPR data export.

#### **PUBLIC LOG OF USE**

Minn. Stat. §13.824 Subd. 5(a) requires that “[a] law enforcement agency that installs or uses an automated license plate reader must maintain a public log of its use...” and requires that the agency maintain the following data as part of the log:

1. Specific times of the day that the reader actively collected data;
2. The aggregate number of vehicles or license plates on which data were collected for each period of active use;
3. A list of all state and federal databases with which the data were compared, unless the existence of the database itself is not public;
4. For each period of active use, the number of vehicles or license plates in each of the following categories:
  - a. The vehicle or license plate has been stolen;
  - b. There is a warrant for the arrest of the owner of the vehicle;
  - c. The owner of the vehicle has a suspended or revoked driver's license or similar category; or,
  - d. The data are active investigatory data
5. For fixed or stationary readers, the location at which the reader is installed and used and actively collected data.

Grand Rapids Police Department does not currently own or use any fixed or stationary ALPRs. The Axon system captures the remaining elements from the list above and is capable of producing a report containing that data. At the time of our audit, GRPD was not proactively generating a public log of use, but possessed the necessary data to print a report if so requested.

We noted that the statute provides limited guidance to the agency for creating the public log of use. While it identifies the required data elements, it doesn't specify how frequently the log should be produced or how long it should be retained. We did note that the General Records Retention Schedule for Minnesota Cities recommends that an ALPR public log of use be retained for two years; however, the

corresponding retention schedule for Minnesota counties has not been updated in more than 20 years and makes no reference to ALPR data whatsoever.

In the absence of statutory guidance, Rampart recommends that the public log of use be created daily, providing the required data elements for the preceding calendar day, and that the logs be maintained for two years.

#### **NOTIFICATION TO THE BCA OF THE LOCATION OF ANY FIXED/STATIONARY ALPRs**

Minn. Stat. §13.824 Subd. 5(b) requires that:

The law enforcement agency must maintain a list of the current and previous locations, including dates at those locations, of any fixed stationary automated license plate readers or other surveillance devices with automated license plate reader capability used by the agency. The agency's list must be accessible to the public, unless the agency determines that the data are security information as provided in section 13.37, subdivision 2. A determination that these data are security information is subject to in-camera judicial review as provided in section 13.08, subdivision 4.

Grand Rapids Police Department does not currently own or use any fixed or stationary ALPRs. Captain Nelson advised us that these are under consideration for future deployment, and confirmed that he was aware of the requirement to provide to the Minnesota Bureau of Criminal Apprehension a list of the locations of any fixed or stationary ALPRs that are placed in the future. Rampart noted that this requirement was also documented in GRPD's ALPR policy.

We noted that while both state statute and GRPD's BWC policy require that the agency maintain a list of previous locations, the statute does provide guidance as to how long the list of previous locations must be maintained. In the absence of authoritative guidance, Rampart recommends that such data be maintained for two years.

#### **ALPR DATA ACCESS CONTROLS**

Minn. Stat. §13.824 Subd. 7(c) requires that:

The ability of authorized individuals to enter, update, or access automated license plate reader data must be limited through the use of role-based access that corresponds to the official duties or training level of the individual and the statutory authorization that grants access for that purpose. All queries and responses, and all actions in which data are entered, updated, accessed, shared, or disseminated, must be recorded in a data audit trail. Data contained in the audit trail are public, to the extent that the data are not otherwise classified by law.

Captain Nelson advised us that access to ALPR data is limited to sworn personnel. Access is granted to a new employee only after he or she reads and signs off on both the GRPD ALPR policy and the

supplemental Chief's Directive, which spells out specific access rights based on job classification (position), the procedure that must be followed in sharing ALPR data with another law enforcement agency, the procedure that must be followed in releasing ALPR data to non-law enforcement persons or agencies, and the training and documentation requirements that pertain to ALPR data access.

Captain Nelson furnished a list of authorized users of ALPR data, which consisted solely of sworn personnel. He further advised us that non-supervisory officers have read-only access, which is necessary to view and respond to license plate hits while patrolling. While access level is based on an officer's role, Captains are responsible for activating an officer's account within the ALPR system and setting their access level. Supervisory personnel, including sergeants, have the ability to search ALPR data. Hot File management, system administration rights and deletion capabilities are limited to the captains and the chief. The Chief's Directive delegates administration of ALPR equipment and data to the captains.

An audit trail report showed that the only entries were logged by Captain Nelson, who oversees Investigations.

#### **ALPR DATA AUDIT TRAIL**

Captain Nelson ran an Audit Trail Report for the audit period. The parameters for the report we reviewed included all queries of ALPR data, which consisted of a limited number of entries categorized as "admin audit." At the time of our audit, ALPR use was primarily limited to patrol operations, with minimal follow-up activity that would be expected to produce audit trail activity as required under Minn. Stat. §13.824 Subd. 7(c).

#### **ALPR DATA DESTRUCTION**

Minn. Stat. §13.824 Subd. 3(a) requires that ALPR data be destroyed no later than 60 days from the date of collection, subject to certain exceptions described earlier in this report. Grand Rapids Police Department has a 30-day retention policy. Settings in the Axon Evidence.com software automatically delete permanently any data contained in the ALPR database that is more than 30 days old. As discussed earlier in this report, ALPR data can be retained beyond 30 days only when identified as active investigatory data, or when requested in writing as potential exculpatory evidence. In such cases, the ALPR data is then manually exported to a separate evidentiary database within the Evidence.com cloud.

As part of the audit, Captain Nelson ran a report to list any retained ALPR data within the ALPR database that was more than 30 days old. The report showed no retained data beyond the 30-day retention period.

#### **INTERNAL CONTROL RECOMMENDATIONS**

We noted that only supervisory personnel have query access to ALPR data, and only the three most senior personnel (the Investigations and Patrol Captains and the Chief) have the ability to audit or export ALPR data. We recommend that a minimum of two senior staff members conduct periodic reviews or internal audits to review data access by GRPD personnel, and document such reviews with a reason code of “admin audit” or a similar meaningful description.

Due to the limited use of ALPR data beyond patrol operations, the audit trail showed minimal entries at the time of our audit. GRPD personnel are currently able to review 100% of data access records. As usage increases, we recommend that internal audits be conducted regularly, and include the following tests at a minimum:

1. Any license plates that are searched multiple times.
2. Random reconciliation of license plate searches to the case number listed in the audit log as the reason for the search, to ensure the search was appropriate.

We recommend that GRPD personnel be required to document any searches of ALPR data in a related case narrative.

We recommend ensuring that audit log data are retained for a minimum of thirty (30) months, to accommodate biennial audits.

We have attached a copy of the GRPD policy to this report as Appendix A.

## AUDIT RESULTS

Based on our review of Grand Rapids Police Department’s ALPR policy and operations, as well as the on-site tests conducted and data reviewed as part of our audit, it is our opinion that GRPD’s ALPR program is substantially compliant with the requirements of Minn. Stat. §§13.824 and §626.8472.

A handwritten signature in black ink, appearing to read "Rampart Audit, LLC". It is written in a cursive, fluid style with a horizontal line underneath the signature.

Rampart Audit, LLC

9/25/2025

## APPENDIX A:

Policy

**447**

### Grand Rapids Police Department

Policy Manual

Updated and Approved by City Council 7/28/2025

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## Automated License Plate Readers (ALPR)

### **447.1 POLICY**

The policy of the Grand Rapids Police Department is to utilize ALPR technology to capture and store digital license plate data and images while recognizing the established privacy rights of the public.

All data and images gathered by the ALPR are for the official use of this department. Because such data may contain confidential information, it is not open to public review.

### **447.2 PURPOSE AND SCOPE**

The purpose of this policy is to provide guidance for the capture, storage and use of digital data obtained through the use of Automated License Plate Reader (ALPR) technology (Minn. Stat. § 626.8472).

### **447.3 DEFINITIONS**

**Alert:** An indication (either visual and/or audible) from the ALPR that the plate read, matches a license plate listed in the Minnesota License Plate Data File or the Manual Hot List.

**Automated License Plate Reader (ALPR):** Per Minn. Stat. § 13.824, Automated License Plate Reader means electronic device mounted on a law enforcement vehicle or positioned in a stationary location that is capable of recording data on, or taking a photograph of, a vehicle or its license plate and comparing the collected data and photographs to existing law enforcement databases for investigative purposes. Automated license plate reader includes a device that is owned or operated by a person who is not a government entity to

the extent that data collected by the reader are shared with a law enforcement agency.

**Be on the Lookout (BOLO):** A determination by a law enforcement agency that there is a legitimate and specific law enforcement reason related to an active criminal investigation to identify or locate a particular vehicle.

**Manual Hot List:** A compilation of license plates or partial license plates for which a BOLO situation exists, and that information is programmed by a user into the ALPR system so that an officer will receive an alert if the ALPR reads a license plate that matches a license plate included on the list.

**Manual Hot Plate Entry:** A determination by a law enforcement agency that there is a legitimate and specific law enforcement reason related to an active criminal investigation to identify or locate a particular vehicle.

**Minnesota License Plate Data File:** A data file provided by the Minnesota Department of Public Safety, Bureau of Criminal Apprehension that contains FBI and Minnesota license plate related Hot File data on stolen and felony vehicles, wanted persons, and attempts to locate. The FBI Hot File records represent all 50 states, the District of Columbia, certain United States Territories, and Canada. The file also contains license plate related data on Minnesota Driver  
and Vehicle

Services registered vehicles where an operator's license was withdrawn (suspended, cancelled, disqualified or revoked.) This file contains no live data.

**NCIC Hotlist:** A data file provided by the FBI that contains Hot File data from all 50 states, the District of Columbia, certain US Territories, and Canada.

**Read:** The process by which the ALPR focuses on, photographs, and converts a picture of a license plate to digital text that comes within range of the ALPR that then may be compared against the Minnesota License Plate Data File or Manual Hot List.

**Real-Time Criminal Justice Information Services (CJIS):** A query of the CJIS system that includes the most up to date data available at the time of the query. CJIS includes any system to process, store, or transmit criminal justice information.

## 447.4 ADMINISTRATION

The ALPR technology, also known as License Plate Recognition (LPR), allows for the automated detection of license plates. It is used by the Grand Rapids Police Department to convert data associated with vehicle license plates for official law enforcement purposes, including identifying stolen or wanted vehicles, stolen license plates and missing persons. It may also be used to gather information related to active warrants, homeland security, electronic surveillance, suspect interdiction, stolen property recovery, and other

investigative purposes.

All installation and maintenance of ALPR equipment, as well as ALPR data retention and access, shall be managed by the Patrol and/or Investigations Captain. The assigned Captain, or other personnel as designated by the Chief of Police, will assign members under his/her command to administer the day-to-day operation of the ALPR equipment and data.

## **447.5 OPERATIONS**

Use of an ALPR is restricted to the purposes outlined below. Department members shall not use, or allow others to use, the equipment or database records for any unauthorized purpose.

- (a) An ALPR shall only be used for official law enforcement business.
- (b) An ALPR may be used in conjunction with any routine patrol operation or criminal investigation. Reasonable suspicion or probable cause is not necessary before using an ALPR.
- (c) While an ALPR may be used to canvass license plates around any crime scene, particular consideration should be given to using ALPR-equipped cars to canvass areas around homicides, shootings, and other major incidents.
- (d) No member of this department shall operate ALPR equipment or access ALPR data without first completing department-approved training.
- (e) No ALPR operator may access confidential department, state or federal data unless authorized to do so.
  
- (f) When an officer receives an alert on the ALPR, the system will notify the officer visually and/or audibly to a match. The officer shall/should then verify the information is current, by running the information through the real-time Criminal Justice Information Services data system prior to taking action.
- (g) Any problems with the ALPR system should be immediately reported to the ALPR administrator or a supervisor.

## **447.6 RESTRICTIONS, NOTIFICATIONS AND AUDITS**

The Grand Rapids Police Department will observe the following guidelines regarding ALPR use (Minn. Stat. § 13.824):

- (A) Data collected by an ALPR will be limited to:
  - 1. License plate numbers.
  - 2. Date, time, and location of data captured.

3. Pictures of license plates, vehicles, and areas surrounding the vehicle captured.
- (B) ALPR data may only be matched with the Minnesota license plate data file, or NCIC Hotlist or approved custom hotlist that relates to active criminal investigations unless additional sources are needed for an active criminal investigation.
  - (C) ALPRs shall not be used to monitor or track an individual unless done so under a search warrant or because of exigent circumstances.
  - (D) The Bureau of Criminal Apprehension shall be notified within 10 days of any installation or use and of any fixed location stationary ALPR.

#### **447.7 DATA COLLECTION AND RETENTION**

The Patrol and/or Investigations Captain are responsible for ensuring systems and processes are in place for the proper collection and retention of ALPR data. Data will be transferred from all ALPR devices to the designated storage in accordance with department procedures.

ALPR data received from another agency shall be maintained securely and released in the same manner as ALPR data collected by this department (Minn. Stat. § 13.824).

ALPR data not related to an active criminal investigation must be destroyed no later than 60 days from the date of collection with the following exceptions (Minn. Stat. § 13.824):

- (a) Exculpatory evidence - Data must be retained until a criminal matter is resolved if a written request is made from a person who is the subject of a criminal investigation asserting that ALPR data may be used as exculpatory evidence.
- (b) Address Confidentiality Program - Data related to a participant of the Address Confidentiality Program must be destroyed upon the written request of the participant. ALPR data already collected at the time of the request shall be destroyed and future related ALPR data must be destroyed at the time of collection. Destruction can be deferred if it relates to an active criminal investigation (Minn. Stat. § 5B.01 - 5B.09)

All other ALPR data should be retained in accordance with the established records retention schedule.

#### **447.8 LOG OF USE**

A public log, available upon request, of ALPR use will be maintained that includes (Minn. Stat. § 13.824):

- (A) Specific times of day that the ALPR collected data.
- (B) The aggregate number of vehicles or license plates on which data are collected for each period of active use and a list of all state and federal public databases

with which the data were compared.

- (C) For each period of active use, the number of vehicles or license plates related to:
  1. A vehicle or license plate that has been stolen.
  2. A warrant for the arrest of the owner of the vehicle.
  3. An owner with a suspended or revoked driver's license or similar category.
  4. Active investigative data.

- (D) For an ALPR at a stationary or fixed location, the location at which the ALPR actively collected data and is installed and used.

A publicly accessible list of the current and previous locations, including dates at those locations, of any fixed ALPR or other surveillance devices with ALPR capability shall be maintained. The list may be kept from the public if the data is security information as provided in Minn. Stat. § 13.37, Subd. 2.

## 447.9 ACCOUNTABILITY

All saved data will be closely safeguarded and protected by both procedural and technological means. The Grand Rapids Police Department will observe the following safeguards regarding access to and use of stored data (Minn. Stat. § 13.824; Minn. Stat. § 13.05):

- (a) All ALPR data downloaded to a mobile workstation and in storage shall be accessible only through a login/password-protected system capable of documenting all access of information by name, date, and time.
- (b) Members approved to access ALPR data under these guidelines are permitted to access the data for legitimate law enforcement purposes only, such as when the data relate to a specific criminal investigation or department-related civil or administrative action. See Chief's Directive – issued 07/29/2025
- (c) The Grand Rapids Police Department is required to arrange for an independent, biennial audit of records to determine whether the data are properly classified, how the data is used, whether the data was destroyed pursuant to statutory guidelines, and to verify compliance with the required data access policies. A report summarizing the results of each audit must be provided to the commissioner of administration and the Legislative Commission on Data Practices and Personal Data Privacy no later than 30 days following the completion of the audit pursuant to Minn. Stat. § 13.824, Subd. 6.
- (d) Breaches of personal data are addressed as set forth in the Protected Information Policy (Minn. Stat. § 13.055).
- (e) All queries and responses, and all actions, in which data are entered, updated, accessed, shared, or disseminated, must be recorded in a data audit trail.

- (f) Any member who willfully violates Minn. Stat. § 13.09 through the unauthorized acquisition or use of ALPR data will face discipline and possible criminal prosecution (Minn. Stat. § 626.8472).
- (g) Data must be limited through the use of role-based access that corresponds to the official duties or training level of the individual and the statutory authorization that grants access for that purpose.

#### **447.10 RELEASING ALPR DATA**

The ALPR data may be shared only with other law enforcement or prosecutorial agencies for official law enforcement purposes or as otherwise permitted by law, using the following procedures (Minn. Stat. § 13.824):

- (a) The agency makes a request for the ALPR data that includes:
  - (a) The name of the agency.
  - (b) The name of the person requesting.
  - (c) The intended purpose of obtaining the information.
  - (d) A record of the factual basis for the access and any associated case number, complaint, or incident that is the basis for the access.
- (b) The request is reviewed by the Patrol and/or Investigations Captain or other personnel as authorized by the Chief of Police.
  - (a) A release must be based on a reasonable suspicion that the data is pertinent to an active criminal investigation.
  - (c) The request is documented in the system audit trail and includes items a through d as listed in paragraph (a)
- (d) The Chief of Police or authorized designee may authorize other Minnesota law enforcement agencies direct query access granted they meet the following criteria:
  - (a) Are required to follow all Minnesota laws related to ALPR data
  - (b) Have a policy related to ALPR access in place
  - (c) Have appropriate audit features on their account.

All requests by non-law enforcement persons or agencies for ALPR data shall be handled in compliance with the Minnesota Government Data Practices Act Chapter 13.824, any other applicable laws, and within policy.

#### **447.11 MANUAL HOT LIST CONTENT AND USE**

The ALPR is capable of alerting to license plates entered by the law enforcement agency

in the ALPR system and not listed in the Minnesota License Plate Data File. Entries into the ALPR system shall comply with the following procedures and Minn. Stat. § 13.824:

- (a) A license plate number or partial license plate number shall only be entered in the Grand Rapids Police Department's Manual Hot List when there is a legitimate and specific law enforcement reason related to an active criminal investigation to identify or locate that particular vehicle, or any person reasonably associated with that vehicle.
- (b) The Manual Hot List should be updated as frequently as practicable. A Manual Hot List entry shall be removed as soon as practicable if there is no longer a justification for the entry.
- (c) If an officer receives an alert based on a Manual Hot List entry, they must follow 428.5 (f) and confirm that current legal justification exists to take action on the alert.
- (d) A Manual Hot List entry may not be used as a substitute for an entry into any other databases such as Minnesota or FBI Hot Files, Nation Crime Information Center (NCIC), or Keeping Our Police Safe (KOPS) files, if appropriate.