

INDEPENDENT AUDIT REPORT

Chief Erik Fadden
Plymouth Police Department
3400 Plymouth Blvd.
Plymouth, MN 55447

Dear Chief Fadden:

An independent audit of the Plymouth Police Department's Automated License Plate Reader (ALPR) System was conducted on October 14, 2025. The objective of the audit was to verify Plymouth Police Department 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

Plymouth Police Department is located in Hennepin County, Minnesota and is authorized for eighty-two (82) peace officers. Plymouth Police Department utilizes fourteen (14) Flock stationary/fixed location ALPRs and two (2) Flock Flex mobile ALPRs. Flock ALPR data is managed and stored in Flock Analytics cloud-based evidence management software. The audit covers the time period March 30, 2024, through September 30, 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 confirmed that ALPR Data collected by Plymouth 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.*

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

A review of the Hotlist Sources in Flock Analytics Admin. confirmed that Plymouth Police Department ALPR data is matched only with data in the Minnesota License Plate Data File. Data is not stored in a central state repository of ALPR data.

In accordance with policy and Minnesota Statute 13.824, Plymouth Police Department does not monitor or track individuals who are the subject of an active criminal investigation using ALPR, nor have they applied for a warrant to do so. Plymouth Police Department has not used 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.

Plymouth Police Department ALPR data has a retention period of thirty (30) days from the date of collection. Data is systematically deleted upon reaching the retention period. A query of data stored in Flock Analytics confirmed that no data older than thirty (30) days was maintained.

Plymouth Police Department had 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 is in accordance with statutes.

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

During the audit period, Plymouth Police Department received and fulfilled 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 case file number that is the basis for access. Law enforcement agencies receiving Plymouth Police Department ALPR data are advised of statute requirements relating to ALPR data. Requests for ALPR data are documented in an Excel spreadsheet and the records management system dissemination log.

Plymouth 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.

Plymouth Police Department public log of ALPR use consists of system generated reports summarizing data collected by ALPRs 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.

Plymouth 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.

Plymouth Police Department maintains records in Flock 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. An Excel spreadsheet and the records management system document sharing of ALPR data with 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.

The Plymouth Police Department ALPR policy governs the operation 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 are permitted to access it for legitimate law enforcement purposes only. Members are required to document the case number related to a criminal investigation, reasonable suspicion, or probable cause to access the data. Access to ALPR data is captured in the Flock audit trail.

Access to ALPR data is managed by the assignment of roles and permissions in Flock. Roles and permissions are administered by the public safety administrator and the administrative sergeant. Flock maintains an audit trail of active ALPR data and captures all actions taken on ALPR data including access.

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.

The Plymouth Police Department has had no security breaches. A BCA CJIS Security Audit was conducted in July of 2024.

No discrepancies noted.

Audit Requirement: Notification to Bureau of Criminal Apprehension

Determine of the agency notified the Bureau of Criminal Apprehension of its ALPR program.

The Plymouth Police Department submitted BCA LPR Agency Data Collection Forms listing locations of stationary ALPRs to BCA but not within ten (10) days of installation/use as required by statute. Plymouth Police Department and the locations of stationary ALPRs appear on the BCA list of agencies using ALPRs.

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

Discrepancy noted.

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

Dated: November 12, 2025

Lynn Lembcke Consulting

Lynn Lembcke

Lynn Lembcke