

INDEPENDENT AUDIT REPORT

Sheriff Brad Wise
Anoka County Sheriff's Office
13301 Hanson Blvd.
Andover, MN 55304

Dear Sheriff Wise:

An independent audit of Anoka County Sheriff's Office Automated License Plate Reader (ALPR) System was conducted on June 25, 2025. The objective of the audit was to verify Anoka County Sheriff's Office 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

Anoka County Sheriff's Office is located in Andover, Minnesota and is authorized for one hundred fifty-one (151) full time and six (6) part-time peace officers. Anoka County Sheriff's Office utilizes Flock ALPRs in stationary/fixed locations and Axon squad ALPRs. Flock ALPR data is managed and stored in Flock Analytics cloud-based evidence management software. Axon ALPR data is stored and managed in Evidence.com cloud-based evidence management software. Flock ALPRs were implemented on October 30, 2023, and Axon squad ALPRs were implemented on June 6, 2024. The audit covers the time period October 30, 2023, through June 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 ALPR data stored in Flock and Evidence.com confirmed that ALPR Data collected by Anoka County Sheriff's Office 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.

Anoka County Sheriff's Office ALPR data is presumptively private. All data collected by Anoka County Sheriff's Office during the audit period is classified as private data. Anoka County Sheriff's Office had no instances of ALPR data with a public data classification.

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 Anoka County Sheriff's Office ALPR data is matched only with data in the Minnesota License Plate Data File.

In accordance with policy and Minnesota Statute 13.824, Anoka County Sheriff's Office does not monitor or track individuals who are the subject of an active criminal investigation using ALPRs without a warrant. The Anoka County Sheriff's Office has applied for warrants to monitor or track individuals who are the subject of active criminal investigations. Tracking warrants are documented in the Flock Hot List. Anoka County Sheriff's Office has not monitored or tracked individuals who are the subject of an active criminal investigation under exigent circumstances without a warrant using ALPR.

No discrepancies noted.

Audit Requirement: Destruction of Data Required

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

Anoka County Sheriff's Office Flock and Axon squad ALPR data has a retention period of thirty (30) days from the date of collection. Data is systematically deleted upon reaching the retention period. Queries in Flock Analytics and Evidence.com confirmed that no data older than thirty (30) days was maintained.

Anoka County Sheriff's Office 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, nor have they received 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.

Anoka County Sheriff's Office's ALPR policy governs the sharing of ALPR data among law enforcement agencies.

During the audit period, Anoka County Sheriff's Office received no requests to share ALPR data with another law enforcement agency. Law enforcement agencies seeking access to ALPR data would be required to submit a written request through the GovQA online data request portal documenting the factual basis and case file number, complaint, or incident that is the basis for access. The ALPR policy requires the Anoka County Sheriff's Office to advise law enforcement agencies requesting access to ALPR data to be advised of statute requirements relating to ALPR data. Requests would be documented in the GovQA data request portal.

Anoka County Sheriff's Office 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.

Anoka County Sheriff's Office 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.

Anoka County Sheriff's Office 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.

Anoka County Sheriff's Office 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. 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. Sharing of data would be captured in the Flock and Evidence.com audit trails. No ALPR data had been shared with another law enforcement agency during the audit period. 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 Anoka County Sheriff's Office ALPR policy governs the operation and access to ALPR data. No member is granted access to or may operate ALPRs without first completing training modules within Flock and Axon.

Nonpublic ALPR data is only available to persons whose work assignments reasonably requires access to the data. Members approved to access ALPR data may access it for official law enforcement business only and when in conjunction with routine patrol operations or criminal investigations. 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 and Evidence.com. Roles and permissions in Flock are granted by an administrator designated within the Flock ALPR software. Roles and permissions in Evidence.com are administered by the Senior Business Systems Analyst. 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.

Anoka County Sheriff's Office has had no security breaches of ALPR data. A BCA CJIS Security Audit was conducted in June of 2025.

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 Anoka County Sheriff's Office notified the Bureau of Criminal Apprehension (BCA) of its ALPR program. A review of the Minnesota Department of Public Safety website confirms that Anoka County Sheriff's Office notified the BCA of their ALPR use and the location of fixed or stationary ALPRs as required by statute.

Anoka County Sheriff's Office has not integrated ALPR technology into another surveillance device.

No discrepancies noted.

This report was prepared exclusively for Anoka County and the Anoka County Sheriff's Office by Lynn Lembcke Consulting. The findings in this report are impartial and based on Anoka County Sheriff's Office ALPR policy and information and documentation provided by Anoka County Sheriff's Office and examined by Lynn Lembcke.

Dated: September 11, 2025

Lynn Lembcke Consulting



Lynn Lembcke