

INDEPENDENT AUDIT REPORT

Chief Brian Podany
Blaine Police Department
10801 Town Square Dr. NE
Blaine, MN 55449

Dear Chief Podany:

An independent audit of Blaine Police Department's Automated License Plate Reader (ALPR) System was conducted on September 30, 2025. The objective of the audit was to verify Blaine 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

Blaine Police Department is located in Anoka County, Minnesota and authorized for eighty-four (84) peace officers.

Blaine Police Department utilizes Flock stationary and movable ALPRs and Axon squad ALPRs. Flock data is stored/managed in Flock Analytics, and Axon squad ALPR data is stored/managed in Evidence.com. Blaine Police Department's Flock ALPRs were implemented in April, 2024, and Axon squad ALPRs were implemented in May, 2024. This audit covers the time period April 9, 2024, through September 15, 2025.

Audit Requirement: Data Collection; Classification; Use Restrictions

Data Collection: Determine if data collected by the ALPRs 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 Blaine 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.

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

Blaine Police Department ALPR data is matched only with data in the Minnesota License Plate Data File and is not stored in a central state repository of ALPR data.

In accordance with policy and Minnesota Statute 13.824, Blaine Police Department did not monitor or track individuals who are the subject of an active criminal investigation using ALPR without first obtaining a warrant to do so. The Blaine 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.

Blaine Police Department's 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 ALPR data older than thirty (30) days was maintained.

Blaine 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. Blaine 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.

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

During the audit period, Blaine Police Department had 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 Blaine 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.

Blaine Police Department's public log of ALPR use consists of system generated reports summarizing data collected from Flock and Axon 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.

The Blaine Police Department maintains a list of the fixed locations of ALPRs and a log of Flex movable camera locations.

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.

Blaine 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. 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. Axon data used in a criminal investigation is converted to evidence and maintained in Evidence.com. No ALPR data had been shared with another law enforcement agency. 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.

Blaine 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. 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.

ALPR data collected by Axon squad devices is integrated into Flock Analytics. All ALPR data is accessible within Flock Analytics. 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.

Administration of Flock Analytics and Evidence.com is managed by a Captain. Access is managed by the assignment of roles and permissions in Flock Analytics and Evidence.com.

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.

Blaine Police Department has had no security breaches, and a BCA CJIS Security Audit was conducted in June of 2022.

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.

The Blaine Police Department submitted LPR Agency Data Collection Forms listing locations of stationary ALPRs to BCA as required by statute. Blaine Police Department appears on the BCA list of agencies using ALPRs. ALPR data collected by Axon ALPRs

is integrated with Flock Analytics. Blaine Police Department has not integrated ALPR technology into any other surveillance device.

No discrepancies noted.

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

Dated: November 3, 2025

Lynn Lembcke Consulting

Lynn Lembcke

Lynn Lembcke