

INDEPENDENT AUDIT REPORT

Chief Matt Markham
Columbia Heights Police Department
3989 Central Ave. NE
Columbia Heights, MN 55421

Dear Chief Markham:

An independent audit of Columbia Heights Police Department's Automated License Plate Reader (ALPR) System was conducted on March 19, 2025. The objective of the audit was to verify Columbia Heights 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

The Columbia Heights Police Department is located in Anoka County, Minnesota and authorized for thirty-one (31) peace officers. Columbia Heights Police Department utilizes Flock ALPRs in seven permanent "Falcon" and five "Flex" movable ALPRs. Data is managed in Flock Analytics software and is stored in the Amazon Web Services cloud.

Columbia Heights Police Department's ALPR program was implemented in May of 2024. This audit covers the time period May 1, 2024, through May 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 confirmed that ALPR Data collected by Columbia Heights 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.*

Columbia Heights Police Department ALPR data is presumptively private. All data collected by Columbia Heights Police Department during the audit period is classified as private data. Columbia Heights Police Department 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.*

Columbia Heights 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, Columbia Heights 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. Columbia Heights Police Department has not monitored or tracked individuals who are the subject of an active criminal investigation under exigent circumstances without a warrant using ALPR technology.

No discrepancies noted.

Audit Requirement: Destruction of Data Required

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

Columbia Heights Police Department's 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.

Columbia Heights Police Department had 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.

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

During the audit period, Columbia Heights 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 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 written request would be retained on file.

Columbia Heights 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.

Columbia Heights Police Department's public log of ALPR use consists of system generated reports that summarize the 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.

The Columbia Heights Police Department maintains a list of the fixed locations of ALPRs which is accessible to the public.

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.

The Columbia Heights 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 data 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. 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.

Columbia Heights Police Department's ALPR policy governs the operation 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. When ALPR data are accessed, officers are required to enter the case file number and reason for the use within Flock. Access to ALPR data is captured in the Flock audit trail.

Administration of Flock is managed by the Deputy Chief and the Crime Analyst. Access is managed by the assignment of roles and permissions in Flock. 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.

Columbia Heights Police Department has had no security breaches, and a BCA CJIS Security Audit was conducted in December of 2024.

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.

Columbia Heights Police Department's ALPR system was implemented in May of 2024.

A review of the Minnesota Department of Public Safety website confirms that Columbia Heights Police Department notified the BCA of their ALPR use and the location of fixed or stationary ALPRs, however, notification was not made within the ten (10) days of installation or use as required by statute.

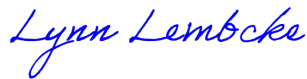
Columbia Heights Police Department has not integrated the ALPR technology into another surveillance device.

Discrepancy noted.

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

Dated: August 20, 2025

Lynn Lembcke Consulting



Lynn Lembcke