



Rampart Audit LLC

DATE 08/12/25

Dear Captain Ott,

Thank you for contacting Rampart Audit LLC regarding our (Automated) License Plate Reader (ALPR/LPR) auditing service. This letter serves to provide written documentation of our proposal.

We will audit the ALPR program of [Grand Rapids Police Department] for the two-year period from **inception through 08/13/2025**. These dates may change slightly depending on the actual date your department began utilizing ALPR technology. The purpose of this audit is to meet the requirements outlined in Minnesota Statute §13.824, as well as Minnesota Statute §626.8472, including but not limited to the following:

1. Whether ALPR data are properly classified under §13.824;
2. How ALPR data are collected, stored, and used Subd. 2
3. Whether ALPR data are destroyed in compliance with Subd. 3;
4. Whether the public log of use is maintained as described in Subd. 5;
5. Whether records are maintained as described in Subd. 6;
6. Whether access to ALPR data is limited and logged in accordance with Subd. 7;
7. Whether shared access, if any, is handled in accordance with Subd. 7;
8. Compliance with §626.8472, which governs written policies and procedures for ALPR systems, including documentation, oversight, training requirements and consequences as outlined in §13.09

We request a copy of their the agency's ALPR policy in electronic format.

Rampart's ability to perform the audit is contingent upon the agency being able to supply the requested reports (most can be produced on site). Those reports include:

- A list of any requests received from the public or other LE agencies for ALPR data during the audit period.
- A list ("audit trail") of any exported ALPR data during the audit period.
- The agency's public log of use, including information about how long they maintain the log.

- Either a list of all disclosable (there are exceptions for things like active investigations) stationary ALPR locations during the audit period, or a written statement from the CLEO or designee that the agency doesn't use stationary ALPRs.
- A list of the authorized users of ALPR data, along with their job title.
- An explanation of the process the agency follows to give an employee access to ALPR data.
- An audit report covering the entire two-year audit period that shows every instance when ALPR data was searched or otherwise accessed – not including the initial processing at the time of capture.
- A report showing all of the retained, non-exported ALPR data as of the date of the audit, so we can verify that data is being deleted as required.
- A report of any license plates searched (not just read by an ALPR but actually searched by a user) multiple times.
- During the audit, we'll review a random sample of LPR "reads" to verify that the system is only collecting the data it's supposed to.
- During the audit, we'll review a random sample of LPR "hits" to review the processing and any action taken.
- During the audit, we'll review a random sample of exported LPR data to review the circumstances of the export and the reason(s) for the extended retention.

The objective of our engagement is the completion of the audit and, upon its completion and subject to its findings, the rendering of our report. As you know, the implementation and operation of the ALPR system, including compliance with relevant Minnesota statutes, is the responsibility of your agency. Accordingly, our procedures will include obtaining written confirmation from the [Grand Rapids Police Department] concerning key representations upon which we will rely.

We will plan and perform our audit to obtain reasonable, but not absolute, assurance that [Grand Rapids Police Department]'s ALPR policy and practices are substantially compliant with §13.824, §626.8472 and §13.09. Accordingly, there is a risk that errors, irregularities, or legal noncompliance, if present, might not be detected. If such matters come to our attention during the audit, we will inform you. Should you wish to expand the scope of our procedures, we would be happy to discuss a separate engagement for that purpose.

Please Note: Minnesota Rules require a department to submit the report to the all the mandated legislature personnel within 30 (thirty) days of the audit's completion. For statutory and timeline purposes, the audit is not complete until we have finished our final written report after the in-person portion of the audit. You will receive a copy of our final report when all audit findings and any reconciliations are complete. Payment must be remitted prior to delivery of the final report. You will receive an invoice upon the completion of the in-person portion of the audit. Please note that completion of the formal report may exceed four (4) weeks.

Our billings for the services described in this letter total **\$3,724.80** as itemized in the attached quote. Any out-of-pocket expenses will be discussed in advance (although they are rare and not anticipated). This engagement includes only those services specifically described herein. Payment is DUE IN FULL within 15 days of the in-person audit. Any requested appearances before boards, agencies, or judicial proceedings arising from this engagement will be billed separately.

We appreciate the opportunity to serve your department. If you agree with the terms of this letter, please return a signed copy for our files, after which we will coordinate to schedule a mutually agreeable audit date.

Sincerely,
Rampart Audit LLC
Daniel E. Gazelka
Owner/Auditor

The foregoing letter fully describes our understanding and is accepted by us.

[Grand Rapids Police Department], State of Minnesota

Date [CLEO (or authorized representative) Name, Title]

Signature