

HENNEPIN COUNTY

MINNESOTA

December 20, 2017

Chief Medaria Arradondo
Police Department
City of Minneapolis
350 S. Fifth St., Room 130
Minneapolis, MN 55415-1389

Dear Chief Arradondo,

Hennepin County has completed an audit of the Automated License Plate Reader (ALPR) system managed and used by the Minneapolis Police Department (MPD) in fulfillment of the statutory audit requirements established by MN State Statute 13.824 Subd. 6. After analysis of the relevant statutory requirements and evaluation of MPD's management and use of ALPR technology and data for the audit review period, Hennepin County has concluded this engagement. This letter is to communicate our findings. We found:

1. MPD is able to produce a public log of ALPR use, including:
 - a. the specific times of day that the reader actively collected data;
 - b. the aggregate number of vehicles or license plates on which data are collected for each period of active use and a list of all state and federal databases with which the data were compared; and
 - c. the number of vehicles or license where the data identify a vehicle or a license plate that has been stolen, a warrant for the arrest of the owner of the vehicle or an owner with a suspended or revoked driver's license or similar category.
2. MPD is able to produce a list of current and previous locations of fixed ALPR cameras.
3. MPD is able to produce records showing the date and time ALPR data were collected.
4. MPD policy provides for the appropriate classification of ALPR data per statute and has procedures in place for the handling of ALPR data requests. Records management policies conform to the statutory classification requirements.
5. Hennepin County found no evidence of use other than for legitimate law enforcement purposes as permitted by statute.
6. The ALPR system is configured to automatically purge data in accordance with statutory retention limits. ALPR data taken as active criminal investigative data are managed according to the MPD criminal case file data retention policies. MPD is encouraged to verify that regular data backups and incidental system logs exclude ALPR data so that ALPR data is not inadvertently retained longer than intended.



7. Access to ALPR data is restricted to trained and authorized staff per MPD's ALPR policy. MPD is encouraged to improve record keeping of written authorization as required by statute. Access queries are logged in an audit trail. A review of queries indicated a practice of documenting legitimate law enforcement reasons for access per statutory requirements.

Based on the above, Hennepin County has determined that MPD conforms to MN State Statute 13.824 in its operation and management of its ALPR system and in its handling of ALPR data. It found that MPD has demonstrated a good faith effort to dutifully comply with the requirements and limits imposed by the legislature in the use of ALPR technology and data and found no evidence of misuse.

Sincerely,

A handwritten signature in blue ink, appearing to read "Karen Marquardt". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Karen Marquardt
Director, Audit, Compliance, and Investigation Services

cc: Mike Kjos, Assistant Chief of Police, City of Minneapolis
Will Tetsell, Director of Internal Audit, City of Minneapolis