

Testimony Packet

Minnesota Legislative Commission on Data Practices and Personal Data Privacy

November 20, 2025

Submitted by:

Dr. Bibi Neumann

Saint Anthony Village, Minnesota

Written Testimony of Dr. Bibi Neumann

Minnesota Legislative Commission on Data Practices and Personal Data Privacy

Public Hearing – November 20, 2025

Saint Anthony Village, Minnesota

To: Chair, Co-Chairs, and Members of the Legislative Commission

From: Dr. Bibi Neumann, Resident of Saint Anthony Village

Re: Testimony on Agenda Items #3 and #6 – Data Retention, ALPR, and BWC Reporting

I. Introduction

Thank you for the opportunity to provide written testimony. I am a resident of Saint Anthony Village and a frequent user of the Minnesota Government Data Practices Act (MGDPA). My recent data requests reveal significant statewide vulnerabilities in retention, transparency, and reporting.

II. Systemic Data Retention Failures (Agenda Item 3)

My requests revealed missing or incomplete officer-response records, inconsistent Public Works documentation, unexplained gaps in personnel complaint files, lack of documentation on which systems were searched, and contradictory statements about whether data was destroyed under Minn. Stat. § 138.17.

A. Downstream Judicial Burden

When residents must litigate simply to access data they are entitled to, it increases municipal spending, strains the courts, and diverts public resources.

B. Recommended Legislative Improvements

1. Retention auditing requirements.
2. Mandatory documentation when data is destroyed.
3. Disclosure of systems searched.
4. Administrative enforcement mechanisms not dependent on litigation.
5. Minimum statewide retention standards.

III. ALPR and Body-Worn Camera Reporting Gaps (Agenda Item 6)

My municipality denied or delayed access to body-worn camera footage in situations governed by Minn. Stat. § 13.825. ALPR data responses were incomplete, inaccessible, or unclear regarding retention, access, or sharing.

A. Need for Uniform Reporting

Without consistent statewide standards, municipalities vary widely, leaving residents without meaningful transparency.

B. Recommended Legislative Improvements

1. Annual ALPR transparency reporting.
2. BWC denial reporting requirements.
3. Uniform statewide retention limits.
4. Public-facing summaries of ALPR/BWC use and data sharing.

IV. Conclusion

Strengthening retention standards and transparency requirements will improve accountability, reduce litigation burdens, and protect both residents and municipalities.

Respectfully submitted,

Dr. Bibi Neumann

Saint Anthony Village, Minnesota

One-Page Summary – Testimony of Dr. Bibi Neumann

Minnesota Legislative Commission on Data Practices

November 20, 2025

1. Data Retention Failures Harm Residents and Burden Courts

- Missing or incomplete police, Public Works, and complaint records.
- No documentation of systems searched.
- No documentation of destruction under Minn. Stat. § 138.17.
- Conflicting explanations for delays or denials.
- Litigation shifts administrative failures onto the judiciary.

Recommendations:

- Retention audits
- Documentation of destruction
- Disclosure of search systems
- Non-litigation enforcement mechanisms
- Minimum retention standards

2. ALPR + BWC Transparency Gaps

- Denials of body-worn camera footage without statutory basis.
- ALPR retention and access policies unclear or undocumented.
- Incomplete or contradictory responses to data requests.

Recommendations:

- Annual ALPR transparency reporting
- BWC denial documentation
- Statewide retention limits
- Public-facing summaries of ALPR/BWC practices