

INDEPENDENT AUDIT REPORT

Sheriff Brian Cruze
Meeker County Sheriff's Office
326 N. Ramsey Ave.
Litchfield, MN 55355

Dear Sheriff Cruze:

An independent audit of the Meeker County Sheriff's Office Portable Recording System (body-worn cameras (BWCs)) was conducted on November 19, 2024. The objective of the audit was to verify Meeker County Sheriff's Office compliance with Minnesota Statutes §§13.825 and 626.8473.

Data elements the audit includes:

Minnesota Statute §13.825

- Data Classification
- Retention of Data
- Access by Data Subjects
- Inventory of Portable Recording System Technology
- Use of Agency-Issued Portable Recording Systems
- Authorization to Access Data
- Sharing Among Agencies

Minnesota Statute §626.8473

- Public Comment
- Body-worn Camera Policy

The Meeker County Sheriff's Office is located in Litchfield, Minnesota and employs thirty (30) peace officers. The Meeker County Sheriff's Office utilizes Axon body-worn cameras and Evidence.com cloud-based evidence management storage. The audit covers the period May 16, 2022, through October 31, 2024.

Audit Requirement: Data Classification

Determine if the data collected by BWCs are appropriately classified.

Meeker County Sheriff's Office BWC data is presumptively private. BWC data collected during the audit period includes both confidential and private or nonpublic data. Confidential data resulted from the discharge of a firearm by a peace officer. Meeker County Sheriff's Office had no incidents of the use of force that resulted in substantial bodily harm, requests from data

subjects for the data to be made accessible to the public, or court orders directing the agency to release the BWC data to the public.

No discrepancies noted.

Audit Requirement: Retention of Data

Determine if the data collected by BWCs are appropriately retained and destroyed in accordance with statutes.

Meeker County Sheriff's Office utilizes the General Records Retention Schedule for Minnesota Counties and agency specified retention periods in Evidence.com. At the conclusion of a BWC recording, officers assign meta data, including an Evidence.com category, to the recording. Each category has an associated retention period. Upon reaching its retention date, evidence is systematically deleted. Deletion of the data is captured in the audit trail.

A report of all BWC data collected during the audit period was produced from Evidence.com. Records from the Evidence Created Report were reviewed, and the date and time the data was created was verified against the deletion date. Several records were deleted in less than the ninety (90) days required by statute. All other records were maintained or deleted in accordance with the record retention schedule and were maintained for at least the minimum ninety (90) days required by statute. Randomly selected audit trail reports were verified against the Evidence Created Report, and each record was deleted or maintained in accordance with the record retention.

The Meeker County Sheriff's Office had received no requests from data subjects to retain BWC data beyond the applicable retention period.

The Sheriff, Chief Deputy, and Sergeants monitor BWC data for proper categorization to ensure BWC data are appropriately retained and destroyed.

Discrepancy noted.

Audit Requirement: Access by Data Subjects

Determine if individuals who are the subject of collected data have access to the data, and if the data subject requests a copy of the data, other individuals who do not consent to its release are redacted.

BWC data is available to data subjects and access may be requested in person and by submission of a Meeker County Law Enforcement Center Information Disclosure Request form. During the audit period, the Meeker County Sheriff's Office had received no requests to view BWC data but did receive and fulfill requests for copies of BWC video from data subjects. Data subjects who

had not consented to release of the data were redacted. A copy of the redacted video is stored in Evidence.com along with the original copy. The data request form is retained in the case file.

No discrepancies noted.

Audit Requirement: Inventory of Portable Recording System Technology

Determine the total number of recording devices owned and maintained by the agency; a daily record of the total number of recording devices actually deployed and used by officers, the policies and procedures for use of portable recording systems by required by section 626.8473; and the total amount of recorded audio and video collected by the portable recording system and maintained by the agency, the agency's retention schedule for the data, the agency's procedures for destruction of the data, and that the data are available to the public.

Meeker County Sheriff's Office BWC inventory consists of thirty (30) devices. An inventory report produced from Evidence.com detailed the total number of recording devices owned and maintained by the agency. The inventory included the device model, serial number, device name, officer assigned to the device, date of last upload, device status, error status, firmware version, warranty date, date last docked, and camera state.

Meeker County Sheriff's Office BWC policy governs the use of portable recording systems by peace officers while in the performance of their duties. The policy requires officers to ensure their BWC is in good working order. If the recorder is not in good working order or an officer becomes aware of a malfunction at any time, they are required to promptly notify their supervisor and obtain a functioning device as soon as reasonably practicable.

Newly hired peace officers are trained on the use of the portable recording system as part of their field training program.

Officers working on randomly selected dates, and randomly selected calls for service, were verified against the Evidence Created Report and confirmed that BWCs are being deployed and officers are wearing and activating their BWCs. The total number of BWC videos created per quarter compared to total calls for service shows a consistent collection of BWC data.

Evidence.com queries and the Evidence Created Report detail the total amount of BWC data created, stored/maintained, and deleted. Meeker County Sheriff's Office utilizes the General Records Retention Schedule for Minnesota Counties and agency specified retention periods in Evidence.com.

BWC video is fully deleted from Evidence.com upon reaching its scheduled deletion date. Meta data and audit trails are maintained in Evidence.com after deletion of BWC audio and video. BWC data is available upon request, and access may be requested by submission of a Meeker County Law Enforcement Center Information Disclosure Request form.

No discrepancies noted.

Audit Requirement: Use of Agency-Issued Portable Recording Systems

Determine if peace officers are only allowed to use portable recording systems issued and maintained by the officer's agency.

Meeker County Sheriff's Office BWC policy states that members are prohibited from using personally owned recording devices while on duty without the express consent of the supervisor.

No discrepancies noted.

Audit Requirement: Authorization to Access Data

Determine if the agency complies with sections 13.05, Subd. 5, and 13.055 in the operation of portable recording systems and in maintaining portable recording system data.

Sergeants conduct random reviews of BWC data to ensure BWC data is being properly categorized and that BWCs are being used in compliance with policy.

Nonpublic BWC data is only available to persons whose work assignment reasonably requires access to the data. User access to BWC data is managed by the assignment of roles and permissions in Evidence.com. Permissions are based on staff work assignments. Roles and permissions are administered by the Sheriff and Senior Administrative Coordinator. Access to Evidence.com is password protected and requires dual authentication.

The agency's BWC and Records Maintenance and Release policies govern access to BWC data. Authorized users may access BWC data pursuant to lawful process and in accordance with policy, statute, and the Minnesota Data Practices Act. User access to data is captured in the audit trail. The BWC policy states that any member who accesses or releases recordings without authorization may be subject to discipline.

When BWC data is deleted from Evidence.com, its contents cannot be determined. Meeker County Sheriff's Office has had no security breaches. A BCA CJIS Security audit was conducted in December of 2023.

No discrepancies noted.

Audit Requirement: Sharing Among Agencies

Determine if nonpublic BWC data is shared with other law enforcement agencies, government entities, or federal agencies.

The Meeker County Sheriff's Office BWC policy allows for the sharing of data with other law enforcement agencies for legitimate law enforcement purposes only and with prosecutors, courts, and other criminal justice entities as provided by law. Agencies seeking access to BWC data are required to submit a written request. Sharing of data is captured in the audit trail. The

Evidence.com Sharing Audit Report and the records management system case notes provide documentation of shared data.

No discrepancies noted.

Audit Requirement: Biennial Audit

Determine if the agency maintains records showing the date and time the portable recording system data were collected, the applicable classification of the data, how the data are used, and whether data are destroyed as required.

Evidence.com and the Evidence Created Report document the date and time portable recording system data were collected and deleted. BWC data collected during the audit period consists of confidential and private or nonpublic data. The Evidence.com audit trail, the Sharing Audit Report, and the records management system document how the data are used. The audit trail is maintained in Evidence.com after deletion of video.

No discrepancies noted.

Audit Requirement: Portable Recording System Vendor

Determine if portable recording system data stored in the cloud, is stored in accordance with security requirements of the United States Federal Bureau of Investigation Criminal Justice Information Services Division Security Policy 5.4 or its successor version.

An Axon CJIS Compliance White paper outlines the specific security policies and practices for Evidence.com and how they are compliant with the CJIS Security Policy. Axon has signed the CJIS Security Addendum in all states and has performed statewide CJIS-related vendor requirements in Minnesota. Axon has incorporated the CJIS Security Addendum by reference into the Axon Master Services and Purchase Agreement. Axon maintains signed CJIS Security Addendum certification pages for Axon personnel. Authorized Axon personnel are required to complete Level 4 CJIS Security Training upon assignment and biennially thereafter.

No discrepancies noted.

Audit Requirement: Public Comment

Determine if the law enforcement agency provided an opportunity for public comment before it purchased or implemented a portable recording system and if the governing body with jurisdiction over the budget of the law enforcement agency provided an opportunity for public comment at a regularly scheduled meeting.

Meeker County Sheriff's Office BWC system was purchased and implemented prior to the requirement of Minn. Statute § 626.8473, Subd. 2. A public hearing on BWC's was held by the

County Board of Commissioners on January 3, 2017.

No discrepancies noted.

Audit Requirement: Body-worn Camera Policy

Determine if a written policy governing the use of portable recording systems has been established and is enforced.

The Meeker County Sheriff's Office BWC is posted on the agency's website. The policy was compared to the requirements of Minn. Stat. § 626.8473. The policy included all minimum requirements of Minn. Stat. § 626.8473, Subd. 3(b), with the exception of 3(b)(3).

Discrepancy noted.

This report was prepared exclusively for the County of Meeker and Meeker County Sheriff's Office by Lynn Lembcke Consulting. The findings in this report are impartial and based on information and documentation provided and examined.

Dated: June 1, 2025

Lynn Lembcke Consulting



Lynn Lembcke