

INDEPENDENT AUDIT REPORT

Andy Youngquist
Chief of Police
Anoka Police Department
275 Harrison St.
Anoka, MN 55303

Dear Chief Youngquist:

An independent audit of the Anoka Police Department's Portable Recording System (body-worn cameras (BWCs)) was conducted on May 20, 2025. The objective of the audit was to verify Anoka Police Department's 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
- Portable Recording System Policy

The Anoka Police Department is located in Anoka County, Minnesota and is authorized for thirty-two (32) peace officers. The Anoka Police Department utilizes Axon body-worn cameras and Evidence.com cloud-based evidence management storage. The audit covers the time period June 1, 2023, through May 15, 2025.

Audit Requirement: Data Classification

Determine if the data collected by BWCs are appropriately classified.

Anoka Police Department BWC data is presumptively private. All BWC data collected during the audit period is classified as private or nonpublic data. The Anoka Police Department had no instances of the discharge of a firearm by a peace officer, 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 BWC's are appropriately retained and destroyed in accordance with statutes.

The Anoka Police Department utilizes the General Records Retention Schedule for Minnesota Cities and agency-specified retention periods in Evidence.com. At the conclusion of a BWC recording, officers assign metadata, including an Evidence.com category, to the recording. Each Evidence.com 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.

An Evidence Created Report consisting of all BWC data collected and deleted during the audit period was produced. Records from the Evidence Created Report were reviewed and the date and time the data was created was verified against the deletion date. Each of the records were deleted or maintained in accordance with the record retention schedule. All records 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 Anoka Police Department had received no requests from data subjects to retain BWC data beyond the applicable retention period during this audit period.

No discrepancies 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 must be redacted.

BWC data is available to data subjects and access may be requested by submission of an Anoka Police Department Body Camera Data Request form. During the audit period, the Anoka Police Department had received no requests to view but did receive and fulfill requests for copies of BWC data from data subjects. Data subjects who had not consented to the release of the BWC data were redacted. A copy of the redacted video is stored in Evidence.com along with the original copy. The data request is documented in the records management system and in an Excel spreadsheet.

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.

Anoka Police Department's BWC inventory consists of thirty-nine (39) 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.

The Anoka Police Department BWC policy governs the use of portable recording systems by peace officers while in the performance of their duties. The policy requires officers to conduct a function test of their BWC at the beginning of each shift to ensure the device is operating properly. Officers noting a malfunction during testing or at any other time are required to promptly report the malfunction to the on-duty supervisor and send an email to the Patrol Captain.

Peace officers initially trained on the use of BWC's during a mandatory department meeting. Officers were trained on the use of Axon BWCs by Axon online training videos. Newly hired officers are trained 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 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.

The Anoka Police Department utilizes the General Records Retention Schedule for Minnesota Cities and agency-specified retention periods in Evidence.com. BWC video is fully deleted from Evidence.com upon reaching its scheduled deletion date. Metadata 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 Body Camera Data 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.

The Anoka Police Department's BWC policy states that Officers may only use Department-issued BWCs in the performance of official duties for the department or when otherwise performing authorized law enforcement services as an employee of the department.

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

Nonpublic BWC data is only available to department employees 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 Chief of Police and Captains. Access to Evidence.com is password protected and requires dual authentication.

The agency's BWC policy governs access to BWC data. Agency personnel are authorized to access BWC data for legitimate law enforcement and data administration purposes. Personnel are prohibited from accessing BWC data for non-business reasons and from sharing BWC data for non-law enforcement related purposes. User access to BWC data is captured in the audit trail. The BWC policy states that officers failing to adhere to the policy or applicable laws regarding the use of BWC and associated data are subject to discipline, up to and including termination.

When BWC data is deleted from Evidence.com, its contents cannot be determined. The Anoka Police Department had no security breaches. A BCA CJIS Security audit was conducted in September of 2024.

No discrepancies noted.

Audit Requirement: Sharing Among Agencies

Determine if nonpublic BWC data shared with other law enforcement agencies, government

entities, or federal agencies is in accordance with statute.

The Anoka Police Department's BWC and Records Maintenance and Release policies govern the sharing of BWC data. BWC data may be shared with other law enforcement agencies for legitimate law enforcement purposes and with prosecutors, courts, and other criminal justice entities as provided by law. Law enforcement agencies seeking access to BWC data are required to submit a written request. Sharing of BWC data is documented in an Excel spreadsheet. Sharing of data is captured in the audit trail and an Evidence Sharing Report provides 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. All BWC data collected during the audit period is classified as private or nonpublic data. The Evidence.com audit trails, an Excel spreadsheet, and the Sharing Audit Report 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.

The Anoka Police Department solicited for public comment by Public Notice in the City's official publication prior to purchase and implementation of the body worn camera program. The Anoka City Council held a public open forum at their February 4, 2019 meeting.

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 Anoka Police Department established and enforces a BWC policy. The policy was compared to the requirements of Minn. Stat. § 626.8473. The policy includes all minimum requirements of Minn. Stat. § 626.8473, Subd. 3(b) with the exception of Subd. 3(b) (2) and (3).

The policy was updated to include all minimum requirements prior to the completion and submission of the final BWC audit report.


The Anoka Police Department's BWC policy is posted on the agency's website.

Discrepancy noted.

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

Dated: July 29, 2025

Lynn Lembcke Consulting



Lynn Lembcke