

INDEPENDENT AUDIT REPORT

Sheriff Jason Purrington
Cottonwood County Sheriff's Office
902 5th Ave.
Windom, MN 56101

Dear Sheriff Purrington:

An independent audit of the Cottonwood County Sheriff's Office Portable Recording System (body-worn cameras (BWCs)) was conducted on June 3, 2025. The objective of the audit was to verify Cottonwood 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 Cottonwood County Sheriff's Office is located in Windom, Minnesota and employs ten (10) peace officers. The Cottonwood County Sheriff's Office utilizes WatchGuard body-worn cameras and Evidence Library management software. BWC data is stored in the Motorola Solutions Cloud. The audit covers the time period February 3, 2023, through April 30, 2025.

Audit Requirement: Data Classification

Determine if the data collected by BWCs are appropriately classified.

Cottonwood County Sheriff's Office BWC data is presumptively private. All BWC data collected during the audit period is classified as private or nonpublic data. The Cottonwood County Sheriff's Office had no instances of the discharge of a firearm by a peace officer in the course of duty, use of force by a peace officer 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 Cottonwood County Sheriff's Office utilizes the General Records Retention Schedule for Minnesota Counties and agency specified retention periods in WatchGuard. At the conclusion of a BWC recording, a WatchGuard category type is assigned. Each category type has an associated retention period. Upon reaching the retention date, data is systematically deleted.

Event log reports of all BWC data collected and deleted during the audit period were produced from Evidence Library. Records from the purged event report were reviewed, and the date the data was collected was verified against the deletion date. Each record was deleted in accordance with the record retention schedule. All records were retained for at least the minimum ninety (90) days required by statute.

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

The Chief Deputy monitors BWC data for proper categorization to ensure BWC data are appropriately retained and destroyed.

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 a Cottonwood County Data/Information Disclosure Request form. During the audit period, the Cottonwood County Sheriff's Office had received neither requests to view nor requests for copies of BWC data from data subjects.

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.

Cottonwood County Sheriff's Office BWC inventory consists of eight (8) devices. Device inventory is maintained in WatchGuard and in an Excel spreadsheet.

Cottonwood 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 they are equipped with a BWC and that it is in good working order. Officers noting a malfunction during testing or at any other time are required to promptly report the malfunction to their supervisor and obtain a functioning device as soon as reasonably practicable. Officers were trained on the use of the portable recording system during implementation utilizing WatchGuard 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 WatchGuard Evidence Library and the event log reports and confirmed that BWCs are being deployed and officers are wearing and activating their BWCs. A review of BWC videos created per quarter shows a consistent collection of BWC data.

The total amount of active data is accessible in the WatchGuard Evidence Library. The total amount of active and deleted data is detailed in the event log reports.

The Cottonwood County Sheriff's Office utilizes the General Records Retention Schedule for Minnesota Counties and agency specified retention in WatchGuard. BWC video is fully deleted upon reaching the scheduled deletion date. Metadata is maintained in the event log reports. BWC data is available upon request, and access may be requested by submission of a Cottonwood County Data/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.

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

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 group roles and permissions in WatchGuard. Permissions are based on staff work assignments. Roles and permissions are administered by the Sheriff and IT. Access to WatchGuard Evidence Library is password protected and requires dual authentication.

The Cottonwood County Sheriff's Office BWC and Protected Information policies govern access to BWC data. The BWC policy states that members may access the department's BWC data pursuant to lawful process, policy, and in compliance with the Minnesota Data Practices Act. The policy states that any member who accesses or releases recordings without authorization may be subject to discipline.

When BWC data is deleted from WatchGuard, its contents cannot be determined. The Cottonwood County Sheriff's Office has had no security breaches. A BCA CJIS Security Audit was conducted in June of 2024.

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.

Cottonwood County Sheriff's Office BWC, Protected Information, and Records Maintenance and Release policies govern the sharing of BWC data with other law enforcement and governmental agencies. The BWC policy states that BWC data may be released pursuant to lawful process and in compliance with statute and the Minnesota Data Practices Act. Agencies seeking access to BWC data would be required to submit a written request. Sharing of data would be documented in the records management system.

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.

WatchGuard Evidence library and the event log reports document the date and time portable recording system data was collected and deleted. All BWC data collected during the audit period

is classified as private or nonpublic data. The audit log and the records management system document how the data are used and shared.

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.

Cottonwood County Sheriff's Office BWC data is stored in the Motorola Solutions Cloud. A Motorola Solutions CJIS Compliance White paper outlines the specific security policies and practices for Motorola Solutions and how they are compliant with the CJIS Security Policy. Motorola performed statewide CJIS-related vendor requirements in Minnesota. Motorola maintains CJIS certification for personnel who are required to complete Level 4 CJIS Security Training upon assignment and annually 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 Cottonwood County Sheriff's Office solicited public comment on the County's web page and a body camera survey prior to the implementation of the BWC program. The Cottonwood County Board of Commissioners held a public hearing at their February 15, 2022 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 Cottonwood County Sheriff's Office established and enforces a BWC policy. 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 Subd. 3(b) (2). The

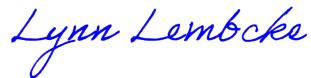
policy was updated to include Subd. 3(b) (2) prior to the completion and submission of the final BWC Audit Report. The BWC policy is posted on the agency's website.

Discrepancy noted.

This report was prepared exclusively for Cottonwood County and the Cottonwood 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: August 2, 2025

Lynn Lembcke Consulting



Lynn Lembcke