

INDEPENDENT AUDIT REPORT

Sheriff James Kamerud
Carver County Sheriff's Office
606 E. Fourth St.
Chaska, MN 55318

Dear Sheriff Kamerud:

An independent audit of the Carver County Sheriff's Office Portable Recording System (body-worn cameras (BWCs)) was conducted on August 26, 2025. The objective of the audit was to verify Carver 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 Carver County Sheriff's Office is authorized for eighty-four (84) peace officers. The Carver County Sheriff's Office utilizes Axon body-worn cameras and Evidence.com cloud-based evidence management storage. The audit covers the period August 16, 2023, through August 15, 2025.

Audit Requirement: Data Classification

Determine if the data collected by BWCs are appropriately classified.

Carver County Sheriff's Office BWC data is presumptively private. During the audit period, the Carver County Sheriff's Office collected both public and private or nonpublic BWC data. Public data resulted from an incident of the discharge of a firearm by a peace officer. The Carver County Sheriff's Office had no incidents of 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 Carver 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 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.

A report consisting of all BWC data collected and deleted 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. Each of the records were deleted or maintained in accordance with the record retention schedule, and all records were retained for at least the minimum ninety (90) days required by statute. Randomly selected audit trail reports were compared to the Evidence Created Report and confirmed that each record was deleted or maintained in accordance with the record retention schedule.

During the audit period, the Carver County Sheriff's Office received no requests from data subjects to retain BWC data beyond the applicable retention period.

Sergeants monitor 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 Carver County Sheriff's Office Request Form for Law Enforcement Data. During the audit period, the Carver County Sheriff's Office 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 the release of data were redacted. A copy of the redacted video is stored in Evidence.com along with the original copy. A copy of the request form is maintained 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.

Carver County Sheriff's Office's BWC inventory consists of seventy-three (73) devices. An inventory search in Evidence.com detailed the 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 Carver 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 confirm that their BWC is in good working order by performing a function test prior to going into service. Officers are required to report any malfunction or damage to the BWC to the on-duty supervisor as soon as practicable, and, if possible, obtain a functioning device.

Peace officers were trained on the use of the portable recording system during implementation. 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 Evidence.com and the Evidence Created Report and confirmed that BWCs are being deployed, and officers are wearing and activating their BWCs. A review of total number of BWC videos created per quarter shows a consistent collection of BWC data.

Evidence.com queries detail the total amount of BWC data created, stored/maintained, and deleted.

The Carver County Sheriff's Office utilizes the General Records Retention Schedule for Minnesota Counties and agency-specified retention periods in Evidence.com. BWC data 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 video and audio. BWC data is available upon request, and access may be requested by submission of a Carver County Sheriff's Office Request Form for Law Enforcement Data.

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 Carver County Sheriff's Office BWC policy states that only office-issued BWCs should be used.

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 reviews of BWC data to ensure BWC videos are 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 a Lieutenant. Access to Evidence.com is password protected and requires dual authentication.

The agency's BWC policy governs access to BWC data. Users may access BWC data only for legitimate office-related purposes and in accordance with policy. Access to BWC data is captured in the audit trail. The BWC policy states that a member who accesses or releases BWC media without authorization may be subject to discipline and subject to criminal penalties.

When BWC data is deleted from Evidence.com, its contents cannot be determined. The Carver County Sheriff's Office has had no security breaches. A BCA CJIS Security Audit was underway at the time of this audit.

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 Carver County Sheriff's Office BWC policy allows for the sharing of nonpublic data with other governmental entities and agencies for legitimate and specified law enforcement purposes. Agencies seeking access to BWC data are required to submit a written request. Sharing of data captured in the Evidence.com audit trail and documented in the Sharing Audit Report. Written requests are maintained in the records management system case file.

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.com 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 public and private or nonpublic classified data. The audit trails, 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.

The Carver County Sheriff's Office solicited for public comment on their website and Facebook. The Carver County Board of Commissioners held a public hearing at their May 18, 2021, County Board Meeting. The BWC system was implemented on November 1, 2021.

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.

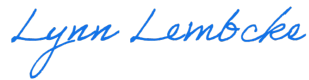
The Carver County Sheriff's Office has established and enforces a BWC policy. The policy was compared to the requirements of Minn. Stat. § 626.8473. The policy includes all minimum requirements of Minn. Stat. § 626.8473, Subd. 3(b). The BWC policy is posted on the agency's website.

No discrepancies noted.

This report was prepared exclusively for the Carver 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: October 5, 2025

Lynn Lembcke Consulting



Lynn Lembcke