

INDEPENDENT AUDIT REPORT

Kris Markeson
Chief of Police
Waseca Police Department
303 State Street So.
Waseca, MN 56093

Dear Chief Markeson:

An independent audit of the Waseca Police Department's Portable Recording System (body-worn cameras (BWCs)) was conducted on October 8, 2025. The objective of the audit was to verify Waseca 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 Waseca Police Department is located in Waseca County, Minnesota and is authorized for twenty (20) peace officers. The Waseca Police Department utilizes Axon body-worn cameras and Evidence.com cloud-based evidence management storage. The audit covers the time period August 1, 2023, through September 30, 2025.

Audit Requirement: Data Classification

Determine if the data collected by BWCs are appropriately classified.

Waseca Police Department BWC data is presumptively private. During the audit period both public and private or nonpublic BWC data were collected. Publicly classified data resulted from an incident involving the use of force that resulted in substantial bodily harm. The Waseca Police Department had no instances of the discharge of a firearm by a peace officer, 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 Waseca 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 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. All records were maintained for at least the minimum ninety (90) days required by statute.

The Waseca Police Department received no requests from data subjects to retain BWC data beyond the applicable retention period during the 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 a Waseca Police Department Body Worn Camera Request Form. During the audit period, the Waseca Police Department 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 request form is maintained in the records management system 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.

Waseca Police Department's BWC inventory consists of eighteen (18) devices. An inventory report produced from Evidence.com detailed the total number of recording devices owned and maintained by the agency. The inventory report 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 Waseca Police Department's 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 assigned BWC is functioning properly at the start of their shift. Officers noting malfunctions during testing or at any other time are required to promptly report the malfunction to their immediate supervisor and send written notification to the BWC administrator.

Peace officers were trained on the use of BWCs by Axon 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 the Evidence Created Report and confirmed that BWCs are being deployed and officers are wearing and activating their BWCs. A review of the total number of BWC videos created per quarter and a comparison to total calls for services shows that BWC data is being consistently collected.

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

The Waseca 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 Waseca Police Department Body Worn Camera 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 Waseca Police Department's BWC policy states that Officers may use only agency-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.

The captain and sergeants conduct 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 captain. 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. Agency personnel are prohibited from accessing BWC data for non-business reasons and from sharing of data for non-law enforcement related purposes. User access to BWC data is captured in the audit trail. The BWC policy states the unauthorized access to or disclosure of BWC data may constitute misconduct and subject individuals to disciplinary action and criminal penalties pursuant to Minn. Stat. § 13.09.

When BWC data is deleted from Evidence.com, its contents cannot be determined. The Waseca Police Department had no security breaches. A BCA CJIS Security audit was conducted in August of 2023.

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 Waseca Police Department's BWC and Records Release and Security policies govern the sharing of BWC data. BWC data may be shared with other law enforcement agencies for legitimate law enforcement purposes that are documented in writing at the time of the disclosure, 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 data is captured in the audit trail and an Evidence.com 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. BWC data collected during the audit period consists of public data and private or nonpublic data. The Evidence.com audit trails 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 Waseca Police Department solicited for public comment on the city's Facebook page and posting of the council agenda report prior to purchase and implementation of the body worn camera program. The Waseca City Council held a public hearing at their July 18, 2023 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 Waseca 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). The BWC policy is posted on the agency's website.

No discrepancies noted.

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

Dated: November 12, 2025

Lynn Lembcke Consulting



Lynn Lembcke