

# INDEPENDENT AUDIT REPORT

Todd Schwieger  
Chief of Police  
St. Francis Police Department  
4058 St. Francis Blvd. NW  
St. Francis, MN 55070

Dear Chief Schwieger:

An independent audit of the St. Francis Police Department's Portable Recording System (body-worn cameras (BWCs)) was conducted of December 11, 2025. The objective of the audit was to verify St. Francis 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 St. Francis Police Department is located in Anoka County, Minnesota and employs twelve (12) peace officers. During the audit period, the St. Francis Police Department utilized Panasonic Arbitrator and Axon BWCs. Panasonic BWC data was stored on a local file server hosted by Metro-Inet, and Axon BWC data is stored in Evidence.com cloud-based evidence management software. The audit covers the time period December 1, 2023 to November 30, 2025.

## **Audit Requirement: Data Classification**

*Determine if the data collected by BWCs are appropriately classified.*

BWC data is presumptively private. All BWC data collected during the audit period is classified as private or nonpublic data. The St. Francis 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 St. Francis Police Department utilizes the General Records Retention Schedule for Minnesota Cities and agency specified retention periods in Arbitrator 360° Back-End Client and Evidence.com. At the conclusion of a BWC recording, a classification/category is assigned. Each classification/category has an associated retention period. Upon reaching the retention date, data is systematically deleted.

An Arbitrator server log report and an Evidence.com Evidence Created Report consisting of all BWC data created and deleted during the audit period were provided. Records from the server log report and 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 St. Francis Police Department received no requests from data subjects to retain BWC data beyond the applicable retention period.

Supervisors monitor categorization of BWC data to ensure 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 an St. Francis Police Department Data Request Form. During the audit period, the St. Francis Police Department had received both requests to view and requests for copies of BWC data from data subjects. Data subjects who had not consented to release of the data were redacted. Access to data is documented in the records management system. Data request forms are 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.*

St. Francis Police Department's BWC inventory consists of fourteen (14) devices. An inventory report produced from Evidence.com detailed the total number of 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 St. Francis Police Department BWC policy governs the use of portable recording systems by peace officers while in the performance of their duties. The BWC policy requires officers to ensure the BWC is in good working order at the beginning of each shift. Peace officers noting a malfunction or damage are required to report the malfunction or damage to the BWC coordinator or on-duty supervisory as soon as practicable and, if possible, obtain a functioning BWC.

Peace officers were initially trained on the use of BWC's during a Minnesota Peace Officer Standards and Training (POST) certified training course. 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 Arbitrator server log report, 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 the total number of BWC videos created per quarter shows BWC data is consistently being collected.

The total amount of active and deleted Panasonic BWC data is documented in the server log report. Evidence.com queries and the Evidence Created Report detail the total amount of Axon BWC data created, stored/maintained, and deleted.

The St. Francis Police Department utilizes the General Records Retention Schedule for Minnesota cities and agency specified retention in Arbitrator and Evidence.com. BWC video is fully deleted upon reaching the scheduled deletion date. Metadata information is maintained on the server and in Evidence.com. BWC data is available upon request, and access may be requested by submission of a 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 St. Francis Police Department's BWC policy states that only department-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.*

Supervisors conduct monthly reviews of BWC data to ensure proper categorization 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 Arbitrator 360° Back-End Client and Evidence.com. Permissions are based on staff work assignments. Roles and permissions are administered by the Chief of Police. Access to Arbitrator 360° Back-End Client and Evidence.com are password protected and requires dual authentication.

The BWC policy governs access to BWC data. Authorized users may only access and view BWC media for legitimate department-related purposes. User access to BWC data is captured in the audit trail. The BWC policy states that any member who accesses or releases BWC media without authorization may be subject to discipline.

When BWC video is deleted from Arbitrator 360° Back-End Client and Evidence.com, its contents cannot be determined. The St. Francis Police Department has had no security breaches. A BCA CJIS security audit was conducted in March of 2025.

*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 St. Francis 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 and government entities for legitimate, specified law enforcement purposes. Agencies seeking access to BWC data are required to submit a written request. Sharing of BWC data is documented in the audit trail and the Evidence.com Sharing Audit Report.

*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.*

The Arbitrator server log report, Evidence.com, and the Evidence Created Report document the date and time BWC data was collected and deleted. All BWC data collected during the audit period is classified as private or nonpublic data. Audit trails, the records management system, and the Sharing Audit Report 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.*

St. Francis Police Department Panasonic BWC data is stored on a file server hosted by Metro Inet. The server is stored in a secure location and access is password protected and requires dual authentication.

Axon BWC data is stored in the cloud. 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 St. Francis Police Department solicited for public comment by online survey on the City's website. The St. Francis City Council held a public hearing at their October 4, 2021, meeting. The BWC program was implemented December 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 St. Francis Police Department 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 City of St. Francis and St. Francis Police Department by Lynn Lembcke Consulting. The findings in this report are impartial and based on information and documentation provided and examined.

Dated: January 29, 2026

Lynn Lembcke Consulting

*Lynn Lembcke*

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Lynn Lembcke