

# INDEPENDENT AUDIT REPORT

Public Safety Director Brian Bierdeman  
Maplewood Police Department  
1830 County Road B E  
Maplewood, MN 55109

Dear Director Bierdeman:

An independent audit of the Maplewood Police Department's Portable Recording System (body-worn cameras (BWCs)) was conducted on August 21, 2025. The objective of the audit was to verify Maplewood 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
- Body-worn Camera Policy

The Maplewood Police Department is located in Ramsey County, Minnesota and is authorized for fifty-six (56) peace officers. The Maplewood Police Department utilizes Axon body-worn cameras and Evidence.com cloud-based evidence management storage. The audit covers the period September 1, 2023, through July 31, 2025.

### **Audit Requirement: Data Classification**

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

Maplewood Police Department BWC data is presumptively private. All BWC data collected during the audit period is classified as private or nonpublic data. The Maplewood Police Department had no incidents 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 BWCs are appropriately retained and destroyed in accordance with statutes.*

The Maplewood 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, metadata, including an Evidence.com category, is assigned to the recording through an interface with the computer aided dispatch system. Each 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. Four recordings capturing locker room/restroom video were manually deleted prior to the ninety (90) days required by statute. Realizing this was not in compliance with statute, Maplewood Police Department had adjusted their procedures during the audit period to not allow for deletion of videos prior to ninety (90) days. All other records were deleted or maintained in accordance with the record retention schedule and maintained for the minimum ninety (90) days required by statute. Randomly selected audit trail reports were verified against the Evidence Created Report, and all records were maintained in accordance with the retention period.

The Maplewood Police Department received a Document Preservation Request to retain BWC data beyond its retention period. The BWC data associated to the request was within the seven (7) year retention period.

BWC data is monitored for proper categorization to ensure BWC data is appropriately retained and destroyed.

*Discrepancy 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 are redacted.*

BWC data is available to data subjects and access may be requested by submission of a City of Maplewood Police Department Body Worn Camera Video Request form. During the audit period, the Maplewood Police Department received both requests to view and requests for copies of BWC video from data subjects. Data subjects who had not consented to release of the data were redacted. A copy of the redacted video is stored in Evidence.com along with the original copy. Request forms are maintained in the case file. Requests are documented in a log and supplemental report.

*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.*

Maplewood Police Department's BWC inventory consists of sixty-six (66) 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, the officer assigned to the device, date of last upload, device status, error status, firmware version, warranty date, data last docked, and camera status.

The Maplewood 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 inspect their BWC to confirm it is charged and in good working order. Officers are required to report any malfunction or damage to the on-duty supervisor and obtain a functioning device. Peace officers were trained on the use of the portable recording system and the BWC policy during implementation. Newly hired officers are trained as part of their mini academy and 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 comparison between 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 Maplewood Police Department utilizes 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 City of Maplewood Police Department Body Worn Camera Video 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 Maplewood 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 data is 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 the IT Director under the direction of the Police Department. Access to Evidence.com is password protected and requires dual authentication.

The agency's BWC Policy governs access to BWC data. Agency personnel may access BWC data for legitimate department-related purposes. The BWC policy states that any member who accesses or releases BWC media without authorization may be subject to discipline.

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

*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 Maplewood Police Department's BWC policy governs the sharing of BWC data. BWC data may be shared with members of other governmental entities and agencies for a legitimate, specified law enforcement purpose. Law enforcement agencies seeking access to BWC data are required to submit a written request. Sharing of data is captured in the audit trail. The Sharing Audit Report and the records management system provide 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 trail, the Sharing Audit Report,

and the case file 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 Maplewood Police Department deployed a number of BWCs prior to the statutory requirement for public comment. The Maplewood City Council held a public hearing at their September 19, 2016, meeting prior to full-department deployment of BWCs.

*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 Maplewood 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 Maplewood and Maplewood Police Department by Lynn Lembcke Consulting. The findings in this report are impartial and based on information and documentation provided and examined.

Dated: February 10, 2025

Lynn Lembcke Consulting

*Lynn Lembcke*

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Lynn Lembcke