

INDEPENDENT AUDIT REPORT

Chief Ben Zender
Mounds View Police Department
2401 Mounds View Blvd.
Mounds View, MN 55112

Dear Chief Zender:

An independent audit of the Mounds View Police Department's Portable Recording System (body-worn cameras (BWCs)) was conducted on December 11, 2025. The objective of the audit was to verify Mounds View 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 Mounds View Police Department is located in Ramsey County, Minnesota and is authorized for twenty-one (21) peace officers. The Mounds View Police Department utilizes WatchGuard body-worn cameras and Evidence Library software. BWC data is stored in the Motorola Solutions WatchGuard Cloud. The audit covers the time period December 1, 2023, through 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 by the Mounds View Police Department during the audit period is classified and private or nonpublic data. The Mounds View Police Department 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 BWCs are appropriately retained and destroyed in accordance with statutes.

The Mounds View Police Department utilizes the General Records Retention Schedule for Minnesota Cities and agency specified retention periods in the 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. Active BWC data is accessible in Evidence Library.

Events log reports consisting of BWC data collected and deleted during the audit period were produced from Evidence Library. Records from the Events Purged reports and audit logs were reviewed and the date the data was created was verified against the purge date. All records were deleted in accordance with the record retention schedule. All records were retained for at least the minimum ninety (90) days required by statute.

The Mounds View Police Department received no requests from data subjects to retain BWC data beyond the applicable retention period.

The deputy chief, supervisors, and records staff 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 an Information Disclosure Request Form. During the audit period, the Mounds View 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 the release of data were redacted. Requests for copies of BWC data are documented in the records management system. Information Disclosure Request forms are scanned into and 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.

Mounds View Police Department's BWC inventory consists of eighteen (18) devices. Device inventory is maintained in an Excel spreadsheet.

The Mounds View Police Department BWC policy governs the use of portable recording systems by peace officers while in the performance of their duties. Peace officers are required to conduct a function test of their BWC at the beginning of each shift to ensure the device is operating properly. Officers noting malfunctions during testing, or at any other time, are required to promptly report the malfunction to their supervisor. Peace officers were trained on the use of portable recording systems during implementation and newly hired officers are trained as part of the field training program.

Officers working on randomly selected dates, and randomly selected calls for service, were verified against 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 data collected per quarter shows that BWC data is being consistently collected.

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

The Mounds View Police Department utilizes the General Records Retention Schedule for Minnesota Cities and agency specified retention in WatchGuard. BWC video is fully deleted upon reaching the scheduled deletion date. BWC data is available upon request, and access may be requested by submission of an 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.

The Mounds View Police Department's BWC policy states that officers may use only department-issued BWCs in the performance of official duties for the agency 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 chief of police, deputy chief and supervisors conduct random reviews of BWC data to ensure BWC data is being properly categorized and that BWCs are being utilized 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 group roles and permissions in Evidence Library. Permissions are based on staff work assignments. Roles and permissions are administered by the Chief of Police. Access to Evidence Library is password protected and requires dual authentication.

The BWC policy governs access to BWC data. Authorized users may access BWC for legitimate law enforcement or data administration purposes and only when there is a business need for doing so. Access to data is captured in the audit log. The BWC policy states that 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.

Mounds View Police Department has had no security breaches. A BCA CJIS Security Audit was last conducted in August of 2022.

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 Mounds View Police Department's BWC policy governs the sharing of BWC data. BWC data may be shared with other law enforcement agencies for legitimate law enforcement purposes and with prosecutors, courts and other criminal justice entities as provided by law. Agencies seeking access to BWC data are required to submit a written request. Sharing of data is 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.

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 records management system documents 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.

Mounds View Police Department's 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 has 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 Mounds View Police Department solicited public comment prior to purchase and implementation of the body worn camera program. Public comment was solicited through a body camera survey. The Mounds View City Council held a public hearing at their December 5, 2016, meeting and approved the purchase of body worn cameras. The body worn camera program was implemented July 1, 2017.

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 Mounds View Police Department established and enforces a BWC policy. The policy was compared to the requirements of Minn. Stat. § 626.8473. The agency's policy includes all minimum requirements of Minn. Stat. § 626.8473, Subd. 3(b). The Mounds View Police Department's BWC policy is posted on the agency's website.

No discrepancies noted.

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

Dated: February 15, 2026

Lynn Lembcke Consulting

Lynn Lembcke

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