

INDEPENDENT AUDIT REPORT

Chief Bradley Paulson
Lakeville Police Department
9237 183rd St. W.
Lakeville, MN 55044

Dear Chief Paulson:

An independent audit of the Lakeville Police Department's Portable Recording System (body-worn cameras (BWCs)) was conducted on February 19, 2026. The objective of the audit was to verify Lakeville 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 Lakeville Police Department is located in Dakota County, Minnesota and employs seventy-three (73) peace officers. The Lakeville Police Department utilizes Axon body-worn cameras and utilizes Evidence.com cloud-based evidence management storage. The audit covers the time period February 13, 2024 through February 13, 2026.

Audit Requirement: Data Classification

Determine if the data collected by BWCs are appropriately classified.

Lakeville Police Department BWC data is presumptively private. All BWC data collected during the audit period is classified as private or nonpublic data. The Lakeville 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 BWC's are appropriately retained and destroyed in accordance with statutes.

The Lakeville 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 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. All records were deleted or maintained in accordance with the record retention schedule. 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 each record was deleted or maintained in accordance with the record retention.

During the audit period, the Lakeville Police Department had received one request from a data subject to retain BWC data beyond the applicable retention period.

Police Sergeants and Administrative Services monitor BWC data for proper categorization 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 a JustFOIA online request or a Lakeville Police Department Data Request Form. During the audit period, the Lakeville Police Department 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 release of the date were redacted. A copy of the redacted video is stored in Evidence.com along with the original copy. Data requests are documented in JustFOIA and the Evidence.com Sharing Audit 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.

Lakeville Police Department's BWC inventory consists of ninety-four (94) devices. An inventory report produced from 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 Lakeville 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 ensure the BWC is in good working order prior to going into service. If the BWC is not in working order or the officer becomes aware of a malfunction at any time, they are required to report the failure to their supervisor and obtain a functioning device as soon as reasonably practicable.

Peace officers were trained on the use of BWCs, policy, and statute 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 calls for service shows that BWC data is being consistently collected.

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

The Lakeville 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 video and audio. BWC data is available upon request, and access may be requested by submission of an online JustFOIA or Lakeville Police Department 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 Lakeville Police Department's BWC policy states that law enforcement officers are prohibited

from using personally owned recording devices while on duty except in case of emergency.

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 videos to ensure BWC data is properly labeled 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 roles and permissions in Evidence.com. Permissions are based on staff work assignments. Roles and permissions are administered by the Business Manager and the Records Compliance Specialist. Access to Evidence.com is password protected and requires dual authentication.

The agency's BWC policy governs access to BWC data. Authorized personnel may access BWC data in compliance with policy and the Minnesota Data Practices Act. Access to BWC data is captured in the audit trail. 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 MSS 13.09.

When BWC data is deleted from Evidence.com, its contents cannot be determined. The Lakeville Police Department has had no security breaches. A BCA CJIS security audit was conducted in March 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 Lakeville Police Department's BWC policy governs the sharing of BWC data. BWC data may be shared with other law enforcement agencies only for legitimate law enforcement purposes and with prosecutors, courts, and other criminal justice agencies as provided by law. Law enforcement agencies seeking access to BWC data are required to submit a written request. BWC data is shared via secure electronic sharing within Evidence.com. Sharing of data is captured in the audit trail. The audit trails and the Evidence.com Sharing Audit Report 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 audit trails, Sharing Audit Report, and JustFOIA document how the data are used and shared. The audit trail is maintained in Evidence.com after deletion of BWC 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 City of Lakeville held community meetings to solicit for public comment. The Lakeville City Council held a public hearing at their July 15, 2019, meeting and approved the BWC policy and purchase of a body worn camera system. The body worn camera system was implemented October 1, 2019.

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

Dated: March 12, 2026

Lynn Lembcke Consulting



Lynn Lembcke