

# INDEPENDENT AUDIT REPORT

Chief Jeffrey McCormick  
Cannon Falls Police Department  
918 River Rd.  
Cannon Falls, MN 55009

Dear Chief McCormick:

An independent audit of the Cannon Falls Police Department's Portable Recording System (body-worn cameras (BWCs)) was conducted on October 29, 2025. The objective of the audit was to verify Cannon Falls 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 Cannon Falls Police Department is located in Goodhue County and employs for seven (7) full-time and two (2) part-time peace officers. The Cannon Falls Police Department utilizes Motorola WatchGuard body-worn cameras and Evidence Library management software. BWC data is stored on a local file server. The audit covers the time period June 29, 2023, through October 15, 2025.

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

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

BWC data is presumptively private. All data collected by the Cannon Falls Police Department during the audit period is classified as private or non-public data. The Cannon Falls 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 BWC's are appropriately retained and destroyed in accordance with statutes.*

The Cannon Falls Police Department utilizes the General Records Retention Schedule for Minnesota Cities and agency specified retention periods in WatchGuard. At the conclusion of a BWC recording, a WatchGuard category type is assigned. Each WatchGuard category type has an associated retention period. Upon reaching the retention date, data is systematically deleted.

Created Events and Events Purged log reports consisting of all BWC data collected and deleted during the audit period were produced from Evidence Library. Records from the Events Purged report were reviewed and the date and time the data was created was verified against the purge date. Three records were purged in less than the ninety (90) days required by statute and several records were purged prior to the record retention scheduled purge date to free up server space.

Active BWC data is accessible in the WatchGuard Evidence Library. The server log maintains a listing of all active and deleted BWC data with associated meta data.

During the audit period, the Cannon Falls Police Department had received no requests from data subjects to retain BWC data beyond the applicable retention period.

The Chief of Police and Lieutenant monitor BWC data for proper categorization to ensure BWC data are 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 must be redacted.*

BWC data is available to data subjects and access may be requested by submission of a Cannon Falls Police Department Information Disclosure Request form. During the audit period, the Cannon Falls Police Department had received no requests to view BWC data but did receive and fulfill requests for copies of BWC data from data subjects. Data subjects who had not consented to the release of data were redacted. Information Disclosure Request forms are 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.*

Cannon Falls Police Department's BWC inventory consists of eight (8) devices. Device inventory is maintained in WatchGuard.

The Cannon Falls Police Department's BWC policy governs the use of BWCs by peace officers in the performance of their duties. The policy requires officers to ensure the BWC is working correctly and to place any BWC found not to be working correctly out of service. Officers report the malfunction by sending notification that the BWC is out of service.

Peace officers were trained on the use of BWCs during in-service training at the time of implementation. New officers are trained as part of their field training program.

Officers working on randomly scheduled dates and randomly selected calls for service were verified against the event log reports and confirmed that recording devices are being deployed and activated by officers. A review of BCW data collected quarterly shows that BWC data is being consistently collected.

The total amount of active BWC data is accessible in the WatchGuard Evidence Library. The total amount of active and deleted data is documented in the Active and Purged Event Reports.

The Cannon Falls Police Department utilizes the General Records Retention Schedule for Minnesota Cities and agency specified retention in WatchGuard. BWC video is fully deleted from the local file server upon the scheduled deletion date. Meta data information is maintained on the server. BWC data is available upon request, and access may be requested by submission of a Cannon Falls Police Department 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 Cannon Falls Police Department's BWC policy states that officers shall only use department approved/issued BWC in the performance of official duties for this 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 Lieutenant conducts reviews of BWC data to ensure proper labeling 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 group roles and permissions in WatchGuard. Permissions are based on staff work assignments. User access is administered by the Chief of Police and the Lieutenant.

The BWC policy governs access to BWC data. Agency personnel may access BWC data only when there is a business need for doing so. Agency personnel are prohibited from accessing BWC data for non-business reasons and from sharing the data for non-law-enforcement-related purposes. Access to data is captured in the audit log. The BWC policy states if an employee misuses the data covered by the BWC policy or intentionally fails to comply with or violates this policy, it will be considered misconduct, and such behavior may be grounds for disciplinary action up to and including discharge.

When BWC data is deleted from WatchGuard, its contents cannot be determined.

The Cannon Falls Police Department has had no security breaches. A BCA security audit was conducted in the fall of 2024.

*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 Cannon Falls Police Department's BWC policy allows for the sharing of data with other law enforcement agencies, 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 WatchGuard Cloud Share and the written request is retained in the case file.

*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 WatchGuard Evidence Library and the server created and purged event reports document the date and time portable recording system data was collected and the retention period of the data. The audit logs and the case file 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.*

Cannon Falls Police Department's BWC data is stored on a local file server. The server is located in a secure area, and access to the server is password protected.

*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 Cannon Falls Police Department implemented BWCs in 2011 prior to the statutory requirement for public comment.

*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 Cannon Falls 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) with the exception of Subd. 3. The BWC policy is posted on the agency's website.

*Discrepancy noted.*

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

Dated: March 24, 2026

Lynn Lembcke Consulting



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Lynn Lembcke