

# INDEPENDENT AUDIT REPORT

Chief Salim Omari  
Eagan Police Department  
3830 Pilot Knob Rd.  
Eagan, MN 55122

Dear Chief Omari:

An independent audit of the Eagan Police Department's Portable Recording System (body-worn cameras (BWCs)) was conducted on April 8, 2026. The objective of the audit was to verify Eagan 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

Eagan Police Department is located in Dakota County, Minnesota and is authorized for seventy-nine (79) peace officers. Eagan Police Department utilizes Axon body-worn cameras and Evidence.com cloud-based evidence management storage. The audit covers the period November 16, 2024 through March 31, 2026.

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

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

Eagan Police Department BWC data is presumptively private. All data collected during the audit period is classified as private or nonpublic data. Eagan 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.*

Eagan 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 meta data, 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. Nine videos of accidental restroom and police department garage activations were deleted in less than the ninety (90) days required by statute. Audit trails document the reason for deletion. All other records were deleted or maintained in accordance with the record retention schedule and were retained for 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 schedule.

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

*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 online via NextRequest data request software. During the audit period, the Eagan Police Department had 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 data were redacted. A copy of the redacted video is stored in Evidence.com along with the original copy. Requests are documented in NextRequest and in an 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.*

Eagan Police Department's BWC inventory consists of ninety-five (95) assigned and eighty-three (83) in-stock 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, the officer assigned to the device, date of last upload, device status, error status, firmware version, warranty date, date last docked, and camera state.

Eagan Police Department's 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 assigned BWC to ensure it is in good working order, and as part of the inspection, perform a function test. Officers are required to report any malfunction or damage to the BWC coordinator or on-duty supervisor as soon as practicable, and, if possible, obtain a functioning device.

Peace officers were trained on the use of the portable recording system by Axon-trained trainers during implementation. Newly hired officers are trained as part of their academy/field training program.

Officers working on randomly selected dates, and randomly selected calls for service, were verified against 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, and a comparison between BWC videos created to calls for service, shows a consistent collection of BWC data.

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

The Eagan 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 audio and video. BWC data is available upon request, and access may be requested online via NextRequest.

*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.*

Eagan 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.*

Lieutenants and Sergeants conduct reviews of specified BWC videos to ensure 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 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 Office Manager. 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 in accordance with policy. User access to data is captured in the audit trail. The BWC policy states that any member who accesses or releases BWC data without authorization may be subject to discipline and may be subject to criminal penalties for the misuse of BWC media pursuant to Minn. Stat. § 13.09.

When BWC data is deleted from Evidence.com, its contents cannot be determined. Eagan Police Department has had no security breaches. A BCA CJIS Security audit was conducted in February of 2026.

*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 Eagan Police Department's BWC and Records Maintenance and Release policies govern the sharing of data with other law enforcement agencies and government entities. Law enforcement agencies seeking access to BWC data are required to submit a written request. BWC data is shared via secure electronic sharing from Evidence.com. Sharing of data is documented in the audit trail, the Evidence.com Sharing Audit Report, and the records management system case notes.

*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 trails and Sharing Audit Report, NextRequest, and the records management system case notes 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.*

Eagan Police Department solicited for public comment through Public Notice. Eagan City Council held a public hearing at their February 4, 2020, meeting. The BWC program was implemented February 16, 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.*


Eagan 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). The BWC policy is posted on the agency's website.

*No discrepancies noted.*

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

Dated: May 6, 2026

Lynn Lembcke Consulting



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Lynn Lembcke