

INDEPENDENT AUDIT REPORT

Chief Ross Gullickson
North Mankato Police Department
1001 Belgrade Ave.
North Mankato, MN 56003

Dear Chief Gullickson:

An independent audit of the North Mankato Police Department's Portable Recording System (body-worn cameras (BWCs)) was conducted on April 21, 2026. The objective of the audit was to verify North Mankato 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 North Mankato Police Department is located in Nicollet County and is authorized for eighteen (18) peace officers. The North Mankato Police Department utilizes Motorola WatchGuard body-worn cameras and Evidence Library software. BWC data is stored in the Motorola WatchGuard Solutions Cloud. The audit covers the time period April 3, 2024, through March 31, 2026.

Audit Requirement: Data Classification

Determine if the data collected by BWCs are appropriately classified.

North Mankato Police Department BWC data is presumptively private. All BWC data collected during the audit period is classified as private or nonpublic data. The North Mankato 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 North Mankato 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 Reports consisting of BWC collected and deleted during the audit period were produced from Evidence Library. Records from the purged event log report were reviewed and the date the data was collected was verified against the purge date. Each of the records were deleted in accordance with the record retention schedule. All records were maintained for at least the minimum ninety (90) days required by statute.

Active BWC data is accessible in the WatchGuard Evidence Library. Event log reports include active and deleted BWC data and associated metadata.

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

Lieutenants and the Administrative Support Coordinator 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 a Request for Information form. During the audit period, the North Mankato Police Department had received neither requests to view nor requests for copies of BWC video from data subjects.

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.

North Mankato Police Department's BWC inventory consists of eighteen (18) devices. An inventory report produced from Evidence Library detailed the total number of recording devices maintained by the agency. The inventory report included the device type, the device name, the device configuration, the serial number, the most recent event date, if the device was active in the selected period, officer assigned to the device, firmware version, and date last connected.

The North Mankato 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 test their assigned BWC to ensure it is functioning properly. Offices noting a malfunction during testing or at any other time are required to promptly report the malfunctions to the BWC Administrator obtain another tested BWC.

Peace officers were trained on the use of BWCs by WatchGuard 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 Created Events and Events Purged reports 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 shows that BWC data is being consistently collected.

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

The North Mankato 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. Metadata is available in the Created Events and Events Purged reports. BWC data is available upon request, and access may be requested by submission of a Request for Information 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 North Mankato 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.

Lieutenants conduct random reviews of BWC data to ensure BWC data is properly labeled 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. Roles and permissions are administered by a Lieutenant and the Chief of Police. Access to WatchGuard Evidence Library is password protected.

The BWC policy governs access to BWC data. Agency personnel may access BWC data only for legitimate law enforcement and data administration purposes and 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 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. § 13.825, Subd. 9.

When BWC data is deleted, its contents cannot be determined. The North Mankato Police Department has had no security breaches. A BCA CJIS Security Audit was conducted in June 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 North Mankato 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. Law enforcement agencies seeking access to BWC data are required to submit a written request. Sharing of data is documented in the records management system dissemination log.

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.

WatchGuard Evidence Library and the Created Events and Events Purged 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 WatchGuard audit logs and the records management system dissemination log 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.

North Mankato 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 North Mankato Police Department solicited for public comment by posting on their website and accepted comments online and in person. The North Mankato City Council held a public hearing at their November 20, 2023 meeting.

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 North Mankato Police Department established and enforces a BWC policy. The policy was compared to the requirements of Minn. Stat. § 626.8473. The policy included all minimum requirements of Minn. Stat. § 626.8473, Subd. 3. The BWC policy is posted on the agency's website.

No discrepancies noted.

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

Dated: May 28, 2026

Lynn Lembcke Consulting



Lynn Lembcke