

INDEPENDENT AUDIT REPORT

Sheriff Tony Harris
Wilkin County Sheriff's Office
515 Dacotah Ave.
Breckenridge, MN 56520

Dear Sheriff Harris:

An independent audit of the Wilkin County Sheriff's Office Portable Recording System (body-worn cameras (BWCs)) was conducted on May 26, 2026. The objective of the audit was to verify Wilkin County Sheriff's Office'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 Wilkin County Sheriff's Office is located in Breckenridge, Minnesota and is authorized for eleven (11) peace officers. The Wilkin County Sheriff's Office utilizes Getac body-worn cameras and Enterprise Evidence Management Getac cloud-based storage. The audit covers the time period February 29, 2024, through May 15, 2026.

Audit Requirement: Data Classification

Determine if the data collected by BWCs are appropriately classified.

Wilkin County Sheriff's Office BWC data is presumptively private. All BWC data collected during the audit period is classified as private or nonpublic data. The Wilkin County Sheriff's Office 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.

The Wilkin County Sheriff's Office utilizes the General Records Retention Schedule for Minnesota Counties and agency specified retention periods in Getac. At the conclusion of a BWC recording, officers assign metadata, including a Getac category, to the recording. Each Getac 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.

Assets Acquired and Assets Deleted Reports consisting of all BWC data collected and deleted during the audit period were produced from Getac Enterprise Management. Records from the and Assets Deleted Reports were reviewed, and the date and time the data was created was verified against the deletion/expiration date. Each of the records were deleted or maintained in accordance with the record retention schedule, however the retention period on the category of Test Recording was set to less than the ninety (90) days required by statute. Corrective action was taken to increase the retention period to ninety (90) days prior to completion of the final report.

The Wilkin County Sheriff's Office received no requests from data subjects to retain BWC data beyond the applicable retention period.

Supervisors 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 are redacted.

BWC data is available to data subjects and access may be requested by submission of a Wilkin County Sheriff's Office Data Request Form. During the audit period, the Wilkin County Sheriff's Office received no requests to view BWC video 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 Getac along with the original copy. Access to data is documented in the records management system dissemination log. Data request forms are maintained in the records management system media.

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.

Wilkin County Sheriff's Office's BWC inventory consists of eleven (11) devices. An inventory report produced from Getac detailed the total number of recording devices owned and maintained by the agency. The inventory included the SKU (Group by Location), serial number, asset number, quantity, status, acquired date, and issued date.

The Wilkin County Sheriff's Office BWC policy governs the use of BWCs by peace officers while in the performance of their duties. The policy requires officers to ensure the BWC is in good working order by conducting a function test of their BWC at the beginning of each shift. 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 BWC to use. The policy requires officer to wear the BWC on their outermost garment positioned at or above the mid-line of the waist.

Peace officers were trained on the use of BWC's during implementation utilizing the Getac online training course. 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 Assets Acquired 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 shows that BWC data is being consistently recorded.

The Assets Acquired and Assets Deleted Reports detail the total amount of BWC data created, stored/maintained, and deleted.

The Wilkin County Sheriff's Office utilizes the General Records Retention Schedule for Minnesota Counties and agency specified retention periods in Getac. BWC video is fully deleted from Getac Enterprise Evidence Management system upon reaching its scheduled deletion/expiration date. Metadata and audit trails are maintained in Getac Enterprise Evidence Management after deletion/expiration of BWC audio and video. BWC data is available upon request, and access may be requested by submission of a Wilkin County Sheriff's Office 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 Wilkin County Sheriff's Office BWC policy states that only office-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.

Supervisors conduct monthly reviews of BWC data to ensure BWC data is being accurately classified 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 Getac Evidence Management. Permissions are based on staff work assignments. Roles and Permissions are administered by the Administrative Assistant and Dispatch Supervisor. Access to Getac Enterprise Evidence Management is password protected and requires dual authentication.

The agency's BWC Policy governs access to BWC data. The BWC policy states that BWC data may only be accessed and viewed for legitimate office-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 media 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 Getac, its contents cannot be determined. Wilkin County Sheriff's Office has had no security breaches. A BCA CJIS Security audit was conducted in June of 2025.

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 Wilkin County Sheriff's Office's BWC policy governs the sharing of BWC data with other law enforcement agencies and government entities. Other law enforcement agencies and government entities may obtain access to not public BWC media for legitimate, specified law enforcement purposes. Agencies seeking access to BWC data are required to submit a written

request. BWC data shared by secure link from Getac Enterprise Evidence Management. Written requests are saved in the records management system media, and sharing of BWC 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.

Getac Enterprise Evidence Management and the Assets Acquired and Assets Deleted Reports 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 Getac Evidence Management audit trail history and the records management system dissemination log document how BWC data are used and shared. The audit trail history is maintained in Getac after BWC video has been deleted.

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.

A Statement of CJIS Compliance dated March 7, 2019, validated Getac Video Solutions full compliance with appropriate controls to protect criminal justice information from creation through dissemination, whether at rest or in transit. The assessment of Getac Video Solutions was conducted by Flat Iron Technologies, LLC. Flat Iron Technologies, LLC, is registered with the federal government as a provider of information security compliance.

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 Wilkin County Sheriff's Office solicited for public comment on its website. The Wilkin

County Board of Commissioners held a public hearing at their November 14, 2023, board 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.

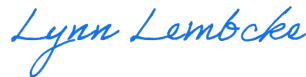
The Wilkin County Sheriff's Office established and enforces a BWC policy. The policy was compared to the requirements of Minn. Stat. § 626.8473. The policy includes all minimum requirements of Minn. Stat. § 626.8473, Subd. 3(b). The BWC policy is posted on the agency's website.

No discrepancies noted.

This report was prepared exclusively for Wilkin County and the Wilkin County Sheriff's Office by Lynn Lembcke Consulting. The findings in this report are impartial and based on information and documentation provided and examined.

Dated: July 28, 2026

Lynn Lembcke Consulting



Lynn Lembcke