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South Lake Minnetonka Police Department 2026 Motorola/WatchGuard Body Worn Camera (BWC) Audit

Executive Summary Report

Prepared for City of South Lake Minnetonka

August 18, 2026



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Background:

South Lake Minnetonka Police Department retained the Minnesota Security Consortium (MNSec) to audit its agency's use of its Body-Worn Camera (BWC, see Definitions Section below) program against the requirements of Minn. Stat. § 13.825 and Minn. Stat. § 626.8473. The Minnesota Security Consortium (MNSec) does not operate or have access to their BWC systems, therefore allowing it to audit the systems as an independent auditor. The South Lake Minnetonka Police Department's Lieutenant provided their administrative access to the Motorola/WatchGuard system during the audit to review audit criteria. Interviews and documents related to the Motorola/WatchGuard system were provided by the South Lake Minnetonka Police Department Command staff during the audit process.

Definitions:

For the purposes of this audit and report, the use of the term Body-Worn Camera (BWC) systems shall be the same as the State Statute definition of "Portable Recording Systems," as defined by Minn. Stat. § 13.825, Subd. 1 (b) as follows:

"portable recording system" means a device worn by a peace officer that is capable of both video and audio recording of the officer's activities and interactions with others or collecting digital multimedia evidence as part of an investigation;

"portable recording system data" means audio or video data collected by a portable recording system; and

"redact" means to blur video or distort audio so that the identity of the subject in a recording is obscured sufficiently to render the subject unidentifiable.

Audit Period and Scope:

The Audit Period covered by this report covers the period 1/1/2024 to 12/31/2025.

South Lake Minnetonka Police Department uses the Cloud Motorola/WatchGuard video system for its BWC program. Although their Motorola/WatchGuard system records both in-squad videos as well as BWC videos, the scope of the audit focused only on BWC video data. Their Motorola/WatchGuard system was treated as their only primary source of all BWC data and was the focus of this audit. All Motorola/WatchGuard BWC data video had date and time stamps of when the data was collected.

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Required Public Hearing:

Pursuant to Minn. Stat. § 626.8473, Subd. 2, South Lake Minnetonka Police Department allowed for public comment regarding its new BWC Program. A public input meeting was held on October 10, 2018. In addition, written comments were collected on or before October 10, 2018, following their public notice and solicitation of public input. During the audit, we inspected both the public notice agenda and the meeting minutes from the SLMPD Coordinating Committee Quarterly Meeting.

South Lake Minnetonka was compliant with this aspect of the Statute, Minn. Stat. § 626.8473, Subd. 2.

Department BWC Policy:

South Lake Minnetonka Police Department has a BWC Policy in place entitled, "Policy Number 2004: Body Worn Cameras." Their Policy was reviewed to ensure that it contained the required elements as outlined in Minn. Stat. § 626.8473, Subd. 3. The policy is found on their public web site:

<https://southlakepd.com/wp-content/uploads/2004-Body-Worn-Cameras-new-format-updated.pdf>

Officer use of BWC Equipment:

South Lake Minnetonka Police Department "Policy Number 2004: Body Worn Cameras" requires that Officers wear their BWC equipment and activate it during specific instances.

BWC data was sampled and audited across the audit period, and more intensely in the periods of March, June and December of 2025. Officer's Calls for Service were compared to the Motorola/WatchGuard video library to determine if they had been recording videos during those calls in accordance with their policy. In virtually all sampled cases, the patrol officers appeared to be using their BWC appropriately and activating recordings as outlined in the policy section, "Use and Documentation."

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Data Classification and Retention:

South Lake Minnetonka Police Department treats BWC data as private unless it is permitted to be released in accordance with the provisions of Stat. § 13.825, Subd. 2.

At the time of the audit, there were no Court mandated BWC data disclosures reported during this audit period.

South Lake Minnetonka Police Department set up its data classification and retention schedule for BWC videos in the administrative settings of the Motorola/WatchGuard console. All BWC data is retained for a minimum of 90 Days, as required by Minn. Stat. §13.825, Subd. 3 (a).

When BWC data involves the use of force, the discharge of a firearm by a peace officer, or an event that triggers a formal complaint against the peace officer, the data is retained for a minimum of one year in accordance with Minn. Stat. § 13.825, subd. 3(b). South Lake Minnetonka Police Department had one incident involving the discharge of a firearm during the audit period, and that incident was sampled to determine BWC compliance. All officers had BWC video except in one justifiable instance (an off-duty investigator responding from home). All BWC audit logs showed that retention had been set to "Permanent."

In addition, on specific types of calls, the South Lake Minnetonka Police Commander(s) in charge of the BWC program also review related BWC videos to ensure that all related videos have the appropriate classification. Any modifications to the classification are auditable in the Motorola/WatchGuard audit trail. Sampled BWC data was examined for modifications to the classification tags. The Motorola/WatchGuard audit trail indicated when the re-classification was made and by whom. Samples examined during the audit showed that BWC Data was tagged with the correct classification and Retention Period.

South Lake Minnetonka Police Department was compliant with its Classification and Retention requirements based on Statute, Minn. Stat. § 626.8473, Subd. 2. And Subd. 3.

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Access by Data Subjects:

South Lake Minnetonka Police Department currently processes BWC data requests by the public via its online Data Records request portal:

<https://www.southlakepd.com/police-services-and-resources/how-do-i/>

These requests are then reviewed by the department's Administrator who approves requests, redacts, and delivers the requested data to the requestor. Police Command staff are consulted as needed.

Use of Agency-Issued BWC:

Minn. Stat. § 13.825, Subd. 6 states that:

"While on duty, a peace officer may only use a portable recording system issued and maintained by the officer's agency in documenting the officer's activities."

South Lake Minnetonka Police Department "Policy Number 2004: Body Worn Cameras," section Use and Documentation (A.) states:

"Officers may use only department-issued BWCs in the performance of official duties for this agency or when otherwise performing authorized law enforcement services as an employee of this department."

A similar policy statement is found in the section Use and Documentation (G.), which states:

"Pursuant to Minn. Stat. § 13.825, subd. 6, officers may only use a portable recording system issued and maintained by the South Lake Minnetonka Police Department in documenting the officer's activity."

South Lake Minnetonka Police Department is probably compliant with part of the Statute.

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Authorization to Access Data:

South Lake Minnetonka Police Department allows its officers to review their own BWC data. Access is enforced using user accounts and roles/rights in the Motorola/WatchGuard system.

BWC data was sampled and audited across the audit period, and more intensely in the period of March, June and December of 2025. In approximately 32 samples, BWC video metadata was reviewed during the audit process by the auditor and the Agency's Police Lieutenant. In all samples, the BWC videos were shown to be viewed by either no one, the officer, supervisor or Records.

All views and access were consistent with South Lake Minnetonka Police Department "Policy Number 2004: Body Worn Cameras" and Minn. Stat. § 13.825 Subd. 7, as authorized by the Chief of Police.

Sharing Among Agencies:

South Lake Minnetonka Police Department treats BWC data as private and may only share BWC data with other agencies permitted under Minn. Stat. § 13.825, Subd. 8 and Subd. 7.

South Lake Minnetonka Police Department stated they process BWC data requests from other law enforcement agencies, usually by email to the South Lake Minnetonka Police Department's Records Department. Requesting agencies must demonstrate a legitimate, specified, and documented law enforcement purpose for the request and often will include the Case Number in their request.

South Lake Minnetonka Police Department was compliant with this aspect of the Statute.

Biennial Audits:

South Lake Minnetonka Police Department has again acknowledged that it intends to complete a biennial audit of its BWC System, as required by Minn. Stat. § 13.825, Subd. 9. Their previous audit was completed in 2024, covering the period ending on 12/31/2023. This year's audit covered the next required two-year (24 month) audit period as required by Statute.

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BWC System Vendors:

At the time of the audit, Motorola/WatchGuard was the primary vendor and system for their BWC program. BWC videos were recorded, classified, and stored Cloud based Motorola/WatchGuard Evidence Library system.

Because Motorola/WatchGuard is a cloud-based solution, it is subject to the requirements of Minn. Stat. § 13.825, Subd. 11 (b), which requires Motorola/WatchGuard to follow the requirements of the FBI's CJIS Policy 5.9.3 or subsequent versions.

At the time of this audit, this was the best documentation we could find for the vendor's compliance:

https://www.Motorola/WatchGuardsolutions.com/en_us/compliance.html

<https://www.Motorola/WatchGuardsolutions.com/content/dam/msi/docs/about-us/cr/Motorola/WatchGuard-solutions-cjis-compliance-program-v2.pdf>

<https://www.Motorola/WatchGuardsolutions.com/content/dam/msi/docs/products/command-center-software/emergency-call-handling/securing-public-safety-software-in-the-cloud-final-whitepaper.pdf>

Motorola/WatchGuard was still not listed as an approved BCA Vendor for BWC data, but the Minnesota BCA has indicated that Motorola/WatchGuard is in the process of going through the vetting process. This does not mean that Motorola/WatchGuard is not CJIS Compliant.

<https://dps.mn.gov/divisions/bca/bca-divisions/mnjis/Pages/bca-vendor-screening-program.aspx>

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Conclusion:

Based on the results of the South Lake Minnetonka Police Department BWC Audit conducted by the Minnesota Security Consortium (MNSec), we were able to demonstrate that South Lake Minnetonka Police Department is using the Motorola/WatchGuard BWC System in accordance with the requirements of Minn. Stat. § 13.825 and Minn. Stat. § 626.8473.

This Audit was conducted and attested to by:

Dimitrios Hilton

Senior Auditor, Minnesota Security Consortium (MNSec)

Submitted to:

- South Lake Minnetonka Police Department Chief of Police
- South Lake Minnetonka City Council
- Legislative Commission on Data Practices and Personal Data Privacy
- Required Legislative members, as specified by Statute
- MN Legislative Library