

INDEPENDENT AUDIT REPORT

Chief Mark Bruley
Brooklyn Park Police Department
5400 85th Ave. No.
Brooklyn Park, MN 55443

Dear Chief Bruley:

An independent audit of the Brooklyn Park Police Department's Portable Recording System (body-worn cameras (BWCs)) was conducted on August 5, 2026. The objective of the audit was to verify Brooklyn Park 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 Brooklyn Park Police Department is located in Hennepin County, Minnesota and employs one-hundred nine (109) peace officers. The Brooklyn Park Police Department utilizes Axon body-worn cameras and Evidence.com cloud-based evidence management storage. The audit covers the time period August 1, 2024, through July 31, 2026.

Audit Requirement: Data Classification

Determine if the data collected by BWCs are appropriately classified.

Brooklyn Park Police Department BWC data is presumptively private. During the audit period, BWC data collected by the Brooklyn Park Police Department consisted of both public and private or nonpublic data classifications. Public data resulted from incidents of the discharge of a firearm by a peace officer and use of force that resulted in substantial bodily harm. The Brooklyn Park Police Department had neither requests from data subjects for the data to be made

accessible to the public nor 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 Brooklyn Park 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 metadata, 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. One record containing locker room video was deleted in less than the ninety (90) days required by statute. Other records were deleted or maintained in accordance with the record retention schedule and were maintained for at least the minimum ninety (90) days required by statute. Randomly selected audit trail reports were verified against the Evidence Created Report, and each record was deleted or maintained in accordance with the record retention.

During the audit period, the Brooklyn Park Police Department received one request from a data subject to retain BWC data beyond the applicable retention period. A letter advising the one-hundred eighty (180) days was about to expire was sent to the data subject.

Sergeants and the Deputy Chief 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 an online JustFOIA request or by submission of a Brooklyn Park Police Department Body Camera Video Request Form. During the audit period, the Brooklyn Park Police Department 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 the BWC data were redacted. A copy of the redacted video is stored in Evidence.com along with the original copy. Data requests are documented in JustFOIA and the records management system.

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.

Brooklyn Park Police Department's BWC inventory consists of one hundred twenty-nine (129) devices. An inventory report produced from Evidence.com detailed the total number of recording devices owned and maintained by the agency. The inventory included the device model, serial number, device name, officer assigned to the device, date of last upload, device status, error status, firmware version, warranty date, date last docked, and camera state.

The Brooklyn Park 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 confirm their BWC is in good working order by conducting a function test at the beginning of each shift. Officers are required to report malfunctions or damage to on-duty supervisor and, if possible, obtain a functioning device. Officers are required to wear their BWC on their outermost garment positioned at or above the mid-line of the waist.

Peace officers were trained on the use of BWCs, policy, and statute 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 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 shows that BWC data is being consistently collected.

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

The Brooklyn Park 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 by submission of an online JustFOIA request or a Body Camera Video 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 Brooklyn Park 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.

Sergeants conduct monthly random reviews of BWC data to ensure BWC data is properly categorized and that BWCs are being utilized in compliance with policy.

Nonpublic BWC data is only available to department employees whose work assignment reasonably requires access to the data. User access to BWC data 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 Deputy Chief and the Police Technology Specialist. Access to Evidence.com is password protected and requires dual authentication.

The agency's BWC policy governs access to BWC data. Agency personnel authorized to access BWC data may only do so for legitimate department-related purposes and in accordance with policy. User access to BWC 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 members 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. The Brooklyn Park Police Department had no security breaches. A BCA CJIS Security audit was conducted in September of 2025.

No discrepancies noted.

Audit Requirement: Sharing Among Agencies

Determine if nonpublic BWC data shared with other law enforcement agencies, government entities, or federal agencies is in accordance with statute.

The Brooklyn Park Police Department's BWC and Records Maintenance and Release policies govern 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 data for legitimate, specified law enforcement purposes. Law enforcement agencies seeking access to BWC data are required to submit a written request. Sharing of data is captured in the Evidence.com audit trail and documented in the records management system activity log and in the Evidence Sharing Audit Report.

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. BWC data collected during the audit period consists of both public and private or nonpublic classified data. The Evidence.com audit trails, the Sharing Audit Report, and the records management system activity 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.

Axon Enterprise, Inc., Evidence.com/Axon Cloud Ecosystem appears on the BCA Vendor Screening Program list of approved and screened vendors and is vetted in accordance with the

security requirements of the United States Federal Bureau of Investigation Criminal Justice Information Services Division Security Policy.

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 Brooklyn Park Police Department solicited public comment prior to purchase and implementation of the body worn camera program. Public comment was solicited through community meetings on December 15, 2015, and January 5, 2016. The Brooklyn Park City Council held a public hearing at their February 8, 2016, 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 Brooklyn Park 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 Brooklyn Park Police Department's BWC policy is posted on the agency's website.

No discrepancies noted.

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

Dated: August 24, 2026

Lynn Lembcke Consulting



Lynn Lembcke