

INDEPENDENT AUDIT REPORT

Sheriff Eric Tollefson
Kandiyohi County Sheriff's Office
2201 23rd Street NE, Suite 101
Willmar, MN 562301

Dear Sheriff Tollefson:

An independent audit of the Kandiyohi County Sheriff's Office Portable Recording System (body-worn cameras (BWCs)) was conducted on August 25, 2026. The objective of the audit was to verify Kandiyohi County Sheriff's Office compliance with Minnesota Statutes §§13.825 and 626.8473.

Data elements the audit include:

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 Kandiyohi County Sheriff's Office is located in Willmar, Minnesota and is authorized for thirty-three (33) full-time and seven (7) part-time peace officers. The Kandiyohi County Sheriff's Office utilizes Motorola WatchGuard body cameras and Evidence Library management software. Body camera data is stored in the Motorola Solutions WatchGuard Cloud. The audit covers the time period April 1, 2024, through August 15, 2026.

Audit Requirement: Data Classification

Determine if the data collected by BWCs are appropriately classified.

Kandiyohi County Sheriff's Office BWC data is presumptively private. During the audit period, BWC data collected by the Kandiyohi County Sheriff's Office consisted of both public and private or nonpublic classified data. Public data resulted from the discharge of a firearm by a peace officer in the course of duty. The Kandiyohi County Sheriff's Office had no instances of 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 Kandiyohi County Sheriff's Office utilizes the General Retention Schedule for Minnesota Counties and agency specified retention periods in Evidence Library. At the conclusion of a BWC recording, a WatchGuard category type is assigned. Each category type has an associated retention period. Upon reaching the retention date, data is systematically deleted.

Created Events and Events Purged reports of all BWC data collected and deleted during the audit period were produced from Evidence Library. Randomly selected records from the Purged Events report were reviewed and the date the data was collected was verified against the deletion date. Two records were manually deleted in less than the ninety (90) days required by statute. The IT Specialist advised that the videos had failed to upload properly and were, therefore, deleted and reuploaded. All other records were deleted in accordance with the record retention schedule and retained for at least the minimum ninety (90) days required by statute.

Active BWC data is accessible in WatchGuard Evidence Library. The Created Events and Events Purged reports maintain a listing of all active and deleted BWC data with associated metadata.

The Kandiyohi County Sheriff's Office received one request to retain BWC data beyond the applicable retention date during the audit 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 must be redacted.

BWC data is available to data subjects and access may be requested by submission of a Request for Government Data form. During the audit period, the Kandiyohi County Sheriff's Office had received both requests to view and requests for copies of BWC data from data subjects. Data

subjects who had not consented to the release of the data were redacted. Requests for BWC data are documented in the records management system dissemination log.

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.

Kandiyohi County Sheriff's Office BWC inventory consists of forty-four devices. Device inventory is maintained within WatchGuard and on an Excel spreadsheet.

The Kandiyohi 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 conduct a function test at the beginning of each shift to make sure the device is operating properly. Officers noting a malfunction during testing or at any other time are required to promptly report the malfunction to their supervisor.

Officers working on randomly selected dates, and randomly selected calls for service, were verified against Evidence Library and 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 data is accessible in the WatchGuard Evidence Library. Total amount of active and deleted data is detailed in the Created Events and Events Purged reports.

The Kandiyohi County Sheriff's Office utilizes the General Records Retention Schedule for Minnesota Counties and agency specified retention in Evidence Library. BWC video is fully deleted upon reaching the scheduled deletion date. BWC data is available upon request, and access may be requested by submission of a Request for Government Data 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 Kandiyohi County Sheriff's Office BWC policy states that officers may use only

department-issued BWC 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.

Supervisors conduct random reviews of BWC videos to ensure BWC data is properly categorized 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 group roles and permissions in Evidence Library. Permissions are based on staff work assignments. Roles and permissions are administered by IT under the direction of the Sheriff's Office. Access to WatchGuard Evidence Library is password protected.

The BWC policy governs access to BWC data. The policy states that no employee may access the department's BWC data except for legitimate law enforcement or data administration purposes. The policy further 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. § 13.09. Access to BWC data is captured in the audit log.

When BWC data is deleted from WatchGuard, its contents cannot be determined. The Kandiyohi County Sheriff's Office has had no security breaches. A BCA CJIS Security Audit was conducted in June of 2023.

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 Kandiyohi County Sheriff's Office BWC policy governs the sharing of BWC data with other law enforcement agencies and governmental entities. BWC data may be shared with other law enforcement agencies for legitimate law enforcement purposes only and with prosecutors, courts, and other criminal justice entities as provided by law. 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. BWC data collected during the audit period includes data classified as both public and private or nonpublic data. The audit log 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.

Kandiyohi County Sheriff's Office BWC data is stored in the Motorola Solutions WatchGuard 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 Kandiyohi County Sheriff's Office solicited public comment prior to the purchase and implementation of the body-worn camera program. Public comment was solicited through a published notice requesting written comments no later than September 23, 2016. The Kandiyohi County Board of Commissioners held a public hearing at their October 5, 2017, meeting. The body-worn camera program was implemented December 1, 2016.

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.

Kandiyohi 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 with the exception of § 626.8473, Subd. 3(b) (2) and (3). The BWC policy is posted on the agency's website.

Discrepancy noted.

This report was prepared exclusively for Kandiyohi County and the Kandiyohi 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: September 21, 2026

Lynn Lembcke Consulting



Lynn Lembcke